Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations
(ordered by respondent ID number)

December 2017

Document 7 of 10
Respondent ID numbers 15400033 to 15495969
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Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

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

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

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

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

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

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

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

I object to the detrimental impact on transport, local roads and road safety. I specifically object to: The assertion that the development will result in a meaningful shift to cycling and walking.

The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

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

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

The Village of Cobham attracts many visitors with its shops and restaurants and the most direct route from the area of Ockham is via Ockham Lane. This road was built for easy access to Cobham for use by the local residents, it is very narrow with no footpaths or cycling track and is only suitable for light traffic due to having very many bends and blind corners. It passes through Ratchford and a flood plain, it is very often closed due to flooding. The danger that any increase in traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) has to be considered.

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5535  Respondent: 15400161 / Christine Halliday  Agent:

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

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

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

My first comment is that the draft Local Plan is not accessible to the majority of residents. As far as I am aware there is no printed book and the files on your website are far too big and numerous to be digested by most members of the general public. Summaries of the Plan should have been produced. If such a document exists please would you send me a copy or advise where I can obtain one.

Having done the best to review the revised draft Plan I think that the scale of development is too great. Too much countryside, which helps to define Guildford as great place to live, will be sacrificed to housing. It is Green Belt for a reason!
Worse still is the fact that the housing will be bought by people working in London and elsewhere, will not address local needs and will mean that the A3 and trains into London will be ever more congested by people travelling from Guildford to their places of work.

Constraints must be placed on the number of houses built and the land taken up. Proper consideration must be given as to how all the additional people and cars are to move around the Town and Borough. The Town is totally congested and its streets dangerous. Accidents are all too frequent on the Stag Hill section of the A3 while there have been fatal accidents in Bridge Street, North Street and a very serious and unpleasant accident in Lower North Street by the Friary involving 2 small children and their grandparents.

The draft Local Plan must be amended to take account of these concerns.

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

**Attached documents:**

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**Comment ID:** PSLPS16/2492  **Respondent:** 15400257 / D J Brock  **Agent:**

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

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

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

Please accept this letter as an objection on all accounts to the building development proposal on the land with boundaries Westwood Lane to the West, Glaziers Lane to the east, Guildford Road to the North and the Railway Line to the South.

This horrendous proposal of 1100 houses, plus other unnecessary buildings, is totally out of keeping with the local area and would effectively double the population of our village.

The government statement: "there are no plans to relax strong protections that prevent inappropriate development on the green belt" would be completely undermined by success of this proposal.

The local population would incur many years of disruption, noise and pollution.

The surrounding roads already cannot support the existing load at peak times without long queues. There would be traffic chaos both during and after the development.

On completion, the valley, north of the middle of the Hogs Back would be scarred and lit up like a beacon at night.

The rural environment that the majority of the local population support would be destroyed forever.

There are many more small pockets of land in the local area enclosed by residential and commercial properties that would be more suited to progressive sustainable development to meet the needs of the local population. The Council should show a more proactive support for the development of these areas for efficient residential expansion.

There are also brown field and unused commercial sites within the perimeter of Guildford town and in the outlying districts which could be redeveloped for housing needs before destroying the open arable land of the countryside.
The need for a 1500 pupil secondary school in this area is unsubstantiated and is a red herring to gain housing development approval. Some schools to the west of Guildford are currently under subscribed and others have the capability and willingness for expansion. The slow population growth does not support the need for additional schools.

Similarly the need for retail development is also unsubstantiated and in fact all household supply shops that were core to the village 45 years ago have failed and are now out of business. There are numerous retail facilities offering a wide range of merchandise within a six mile radius of the village which the local population have shown to prefer.

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

Attached documents:

Comment ID: PSLPS16/4014  Respondent: 15400257 / D J Brock  Agent:

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

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

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

Please accept this letter as an objection to the recent disclosure of a building development proposal on the land with boundaries Westwood lane to the west, Glaziers Lane to the east, Guildford Road to the North and the Railway Line to the South.

This horrendous proposal of 1100 houses, plus other unnecessary buildings, is totally out of keeping with the local area and would effectively double the population of our village. The government statement: "there are no plans to relax strong protections that prevent inappropriate development on the green belt" would be completely undermined by success of this proposal.

The local population would incur many years of disruption, noise and pollution. The surrounding roads already cannot support the existing load at peak times without long queues. There would be traffic chaos both during and after the development. On completion, the valley north of the middle of the Hogs Back would be lit up like a beacon.

The rural environment that the majority of the local population support would be destroyed forever.

There are many more small pockets of land in the local area enclosed by residential and commercial properties that would be more suited to sustainable development to meet the needs of the local population. There are also brown field and unused commercial sites within the perimeter of Guildford town and in the outlying districts which could be redeveloped for housing needs before destroying the open arable land of the countryside.

The need for a 1500 pupil secondary school in this area is unsubstantiated and is a red herring to gain housing development approval. Similarly, the need for retail development is also unsubstantiated and in fact all household supply shops that were core to the village 45 years ago have failed and are now out of business.

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

Attached documents:

Comment ID: PSLPP16/5538  Respondent: 15400353 / Michael Williams  Agent:
I object to the 2016 draft Local Plan on a number of grounds, some of which are as follows:

1. There is no evidence backing the alleged need for new housing on this scale
   1. Where is the provision of new schools and Doctors Surgeries to support this?
   2. I object to the limited consultation period
   3. I object to any erosion of the Green Belt
   4. I object to site A43 Garlicks Arch, which will increase the already chaotic traffic conditions on the Portsmouth Road
   5. I object to site A43a at Clandon, which will only increase traffic conditions
   6. I object to the over development at site A45
   7. I object to the unlawful site A57
   8. I object to the disproportionate amount of development proposed for the Ripley area
   9. I strongly object to any erosion of the Green Belt
12. Road traffic and parking in Ripley is already chaotic, making these proposals unsustainable

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

Attached documents:

Comment ID: PSLPS16/2493  Respondent: 15400385 / Robert Bonnar  Agent:

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

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

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

- Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

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

Attached documents:

Comment ID: PSLPP16/5540  Respondent: 15400385 / Robert Bonnar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

- Object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.

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

Attached documents:

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**Comment ID:** PSLPP16/5546  **Respondent:** 15400385 / Robert Bonnar  **Agent:**

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

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

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

- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

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

Attached documents:

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**Comment ID:** PSLPP16/5537  **Respondent:** 15400385 / Robert Bonnar  **Agent:**

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

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

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

Despite living outside the Borough of Guildford I have a greater interest in what goes into the Guildford Local Plan for the local area than many of those living on the far side of the borough.

In summary my objections are as follows...
Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.

There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

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

Attached documents:

Comment ID: PSLPP16/5544  Respondent: 15400385 / Robert Bonnar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

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

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

Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

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

Attached documents:

Comment ID: PSLPP16/5543  Respondent: 15400385 / Robert Bonnar  Agent:

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

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

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

Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

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

Attached documents:
Table with comments and responses:

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<td>- Object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.</td>
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<td>- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.</td>
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<td>- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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• Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

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

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

This awful proposal of 1100 houses and other buildings is totally out of keeping with the local area and would double the population of our village.

The rural environment of the local population support would be destroyed forever.

Disruption and both noise and air pollution would affect the local population for many years during and after the development.

Transport on the surrounding roads is already a problem. The existing infrastructure cannot support the existing load at peak times without long queues. There would be traffic chaos both during and after the development.

During development and after completion, the valley viewed from Hogs Back would be scarred forever and lit up like a beacon at night.

Small pockets of land in the local area enclosed by residential and commercial properties would be more suited to sustainable development to meet the needs of the local population. The Council should show more support for the development of these areas.

Brown field and unused commercial sites within the perimeter of Guildford town and in the outlying districts should be redeveloped for housing needs before destroying the open arable land of the countryside.
The need for a 1500 pupil secondary school in this area is unsubstantiated. Some schools within the Guildford Borough are currently under subscribed and others have the ability for expansion. The population growth does not support the need for additional schools.

A need for retail development is unsubstantiated. All household supply shops that were core to the village have failed and are now out of business. The local retail facilities offering a wide range of merchandise within a reasonable distance of the village have proven to be adequate.

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

Attached documents:

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Comment ID: PSLPS16/2496  Respondent: 15400545 / James Harper  Agent:

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

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

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

I raise objection to the Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwelling as we use this Green Belt are extensively for recreation and appreciation of wildlife.

There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land and as such No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt so I OBJECT to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

I OBJECT to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys, Effingham and Cobham. The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs, this in no way is acceptable.

The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable/unachievable/unreal. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used, this car park is also at full capacity as are the route through Cobham Villiage to get to the station. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
I Object to the issue of **air quality** not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

I Object to **insufficient consideration being given to the environmental and ecological value of the site and the area around it**, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

**The area is a haven for wildlife, some of which is already endangered.** The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

I reiterate the area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford and the roads, public transport in the area are not of a standard to accommodate the development.

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

**Attached documents:**

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**Comment ID:** PSLPS16/2499  **Respondent:** 15400609 / Brian Carte  **Agent:**

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

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

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

I am writing to object to the inclusion of the Former Wisley Airfield in your Borough plan.

Although I do not live in the borough I have lived in the area for over 40 years and have a great interest in the wider environment and how developments will impact on surrounding areas.

I see the proposal has no basis for inclusion when other brownfield sites can be identified, green belt should be preserved as a basis of preventing urban creep.

The surrounding areas, villages, roads, schools, countryside, will be swamped by such a development.

Residents in the area already suffer severe congestion on the local and national roads (A3 and M25). Air quality is already a major concern on many local roads being used by locals and those vehicles trying to avoid the aforementioned congestion.

The inclusion of this site is a little strange and surprising bearing in mind your own planning committees rejection of application no 15/P/00012 in April of this year.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPA16/1390  Respondent: 15400641 / Anne Barker  Agent:

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

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

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

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers numbers for financial gain and not for social need.

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

Attached documents:

Comment ID: PSLPS16/2504  Respondent: 15400641 / Anne Barker  Agent:

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

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

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

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

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

Attached documents:

Comment ID: PSLPP16/5555  Respondent: 15400641 / Anne Barker  Agent:

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

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

I object to a totally unrealistic number of houses for the country lanes to absorb.

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

Attached documents:

Comment ID: PSLPP16/5557  Respondent: 15400641 / Anne Barker  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5556  Respondent: 15400641 / Anne Barker  Agent:

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

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

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

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East bas taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan bas been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:
The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in the Borough.

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

**Attached documents:**

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**Comment ID:** PSLPP16/5592  **Respondent:** 15400769 / H L Cunnah  **Agent:**

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

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

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

I write to note my objections to the Proposed Local Plan. That the Local Borough could propose such a plan, with total disregard for the necessary infrastructure for it to be in any way viable is nothing short of ludicrous. My main objections, which echo the sentiments of almost the entire village, are as follows:

**(1) Schools & Medical Facilities/Local Amenities -**

Local schools are already at capacity - where will newcomers go to school? No extra places are planned in the Horsleys. We specifically moved to the area as a family so that our daughter could be schooled at the local school. Already bursting at the seams, there is no provision for the extra potential 1,000 children to be educated. WHERE WILL THESE CHILDREN GO TO SCHOOL? The same problem exists with the local health centre. There is again no provision whatsoever. There is similarly no plan for the necessary local amenities for the additional homes. Where are we to shop? It seems the 'plan' is to throw up as many houses as possible, ignore the Green Belt and hope for the best.

**(2) Increased Traffic and Lack of Parking Facilities -**

On the assumption that every new house has at least 2 cars, this means potentially 6,000 more cars within a 3-mile radius of the Horsleys. The impact on local roads will be awful. The roads are already in a terrible state, continually crumbling due to the strain of existing traffic and poor drainage causing flooding. Parking at Horsley & Effingham Junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be untenable.

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

**Attached documents:**

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**Comment ID:** PSLPP16/10724  **Respondent:** 15400769 / H L Cunnah  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
OBJECTION TO PROPOSED LOCAL PLAN

I write to note my objections to the Proposed Local Plan. That the Local Borough could propose such a plan, with total disregard for the necessary infrastructure for it to be in any way viable is nothing short of ludicrous. My main objections, which echo the sentiments of almost the entire village, are as follows:

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

Attached documents:

Comment ID: PSLPP16/10726  Respondent: 15400769 / H L Cunnah  Agent:

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

(3) Increased Traffic and Lack of Parking Facilities -
On the assumption that every new house has at least 2 cars, this means potentially 6,000 more cars within a 3-mile radius of the Horsleys. The impact on local roads will be awful. The roads are already in a terrible state, continually crumbling due to the strain of existing traffic and poor drainage causing flooding. Parking at Horsley & Effingham Junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be untenable.

(4) Local Road Networks –
As mentioned above, the roads in the Horsleys struggle to cope with the volume of traffic that already exists. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is inevitably true for the proposed developments in East and West Horsley as well.
(5) Pollution – 
The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

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

Attached documents:

Comment ID: PSLPP16/5601  Respondent: 15400769 / H L Cunnah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

- Loss of Green Belt land -
Sadiq Khan, the new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won't be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on Greenfield sites in Normandy.) We must place some value on Greenbelt land as otherwise there will be none left for future generations.

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

Attached documents:

Comment ID: PSLPP16/10725  Respondent: 15400769 / H L Cunnah  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

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

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- **Flooding**

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains - the drains can't cope. There are no plans in place to improve the drains, which are already unable to cope, but rather to place an enormous additional strain on them that will exacerbate the problem and cause further problems for all residents.

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

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(6) **Flooding** –

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

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My husband works in the property sector, and his business relies upon development. I am certainly not opposed to the idea of sustainable, reasonable development - but the proposed plan will ruin the Horsleys, destroy the beauty of the surrounding Green Belt and makes no provision for the obvious strains on services and infrastructure that such development would cause.

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

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<td>A46. A47. A50.</td>
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<td>The Green Belt is protected as a matter of national and local policy and I object to GBC’s proposal to build houses etc on it going against previous public consultations</td>
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<td>Brownfield sites in the Guildford urban area, if used properly, would be sufficient to meet all building targets. I object to all building on green belt or green field sites, because if this is allowed to commence, the unborn sprawl will reach from Guildford straight through to Aldershot and Farnham</td>
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</table>
Normandy and Flexford needs and priorities do not include a secondary school. I object to this proposal as there are already two such schools to the west of Guildford with some hundreds of empty places.

The local so-called plan will permanently destroy Normandy and Flexford rural status. It will bring chaos to traffic movements, air pollution will increase and will turn a very pleasant village into urban sprawl.

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

Attached documents:

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Comment ID: SQLP16/929  Respondent: 15400833 / William John Scott  Agent:

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

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

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

A46. A47. A50.

Normandy and Flexford. I object because this area was not included in the previous consultation. In 2014 it was ‘safeguarded’ and not removed from the greenbelt, and no exceptional circumstances have been put forward.

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

Attached documents:

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Comment ID: SQLP16/933  Respondent: 15400833 / William John Scott  Agent:

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

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

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

A46. A47. A50.

This fails the national planning policy framework being a huge development which would completely destroy Normandy and Flexford rural structure. I object most strongly to these proposals. There has been no discussion with local people or their organisations.

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

Attached documents:
Comment ID: SQLP16/934  Respondent: 15400833 / William John Scott  Agent: 

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

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

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

A46. A47. A50.

I object to any building between Westwood Lane and glaziers lane because they are both too narrow, and each one has a lethal railway bridge. Any increase in local traffic would greatly increase the likelihood of more motor accidents on these two lanes. There have been deaths at both bridges in past years.

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

Attached documents:

Comment ID: SQLP16/935  Respondent: 15400833 / William John Scott  Agent: 

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

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

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

A46. A47. A50.

In recent years the local lanes have become a rat-run for huge articulated vehicles which after interfere with traffic flow. Any further development in this area would cause chaotic hold- ups on the already crowded roads.

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

Attached documents:

Comment ID: pslp172/5156  Respondent: 15400833 / William John Scott  Agent: 

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

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

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

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

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

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

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPA16/1398</th>
<th>Respondent: 15400865 / M J Cunnah</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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• Local Road Networks

As mentioned above, the roads in the Horsleys struggle to cope with the volume of traffic that already exists. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that "consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed". It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is inevitably true for the proposed developments in East and West Horsley as well.

• Pollution

The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in the Borough.

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

Attached documents:

Comment ID: PSLPP16/5597  Respondent: 15400865 / M J Cunnah  Agent:

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

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

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

Attached documents:

Comment ID: PSLPP16/10600  Respondent: 15400865 / M J Cunnah  Agent:

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

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

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

3) Increased Traffic and Lack of Parking Facilities -
On the assumption that every new house has at least 2 cars, this means potentially 6,000 more cars within a 3-mile radius of the Horsleys. The impact on local roads will be awful. The roads are already in a terrible state, continually crumbling due to the strain of existing traffic and poor drainage causing flooding. Parking at Horsley & Effingham Junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be untenable.

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Attached documents:

Comment ID: PSLPP16/10598  Respondent: 15400865 / M J Cunnah  Agent:

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

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

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

2) Loss of Green Belt land – Sadiq Khan, the new Mayor of London, has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on Greenfield sites in Normandy.) We must place some value on Greenbelt land as otherwise there will be none left for future generations.

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

Attached documents:

Comment ID: PSLPP16/10601  Respondent: 15400865 / M J Cunnah  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Flooding –
The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope. There are no plans in place to improve the drains, which are already unable to cope, but rather to place an enormous additional strain on them that will exacerbate the problem and cause further problems for all residents.

I work in the property sector, and my business relies upon development. I am certainly not opposed to the idea of sustainable, reasonable development - but the proposed plan will ruin the Horsleys, destroy the beauty of the surrounding Green Belt and makes no provision for the obvious strains on services and infrastructure that such development would cause.

I trust that my objections are noted.

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

Attached documents:

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Comment ID: PSLPS16/2517  Respondent: 15400897 / Alison Parkinson  Agent:

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

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

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

I OBJECT to building 45 houses at Clockbarn Nursery - this is already a dangerous and overloaded road as it is!

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

Attached documents:

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Comment ID: PSLPS16/2518  Respondent: 15400897 / Alison Parkinson  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to building 400 houses and 7000sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. This is a site with precious ancient woodland and it is also susceptible to flooding. Surely with proper use of brownfield sites near Guildford this area is not needed.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2520</th>
<th>Respondent: 15400897 / Alison Parkinson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

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

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

I OBJECT to a new interchange with the A3 at Burnt Common because Send Village is already gridlocked in the morning and evening and this development would mean the village would have to take a huge weight of additional traffic which is absolutely ridiculous to even contemplate!

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2519</th>
<th>Respondent: 15400897 / Alison Parkinson</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>

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

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

I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. This is already an extremely dangerous lane as my husband knows to his cost having had his car written off when he turned out at the bottom of the road any more traffic here would make it an accident BLACK SPOT - please don't do it!!!

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5604</th>
<th>Respondent: 15400897 / Alison Parkinson</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
As a resident of Send I am writing to object to the PROPOSED DESTRUCTION OF OUR VILLAGE!

There are so many aspects of the proposed development that I am extremely concerned about as follows:

I OBJECT to Send Village being removed from the Green Belt. I moved to this village specifically because it was in Green Belt and if this is removed from the area it will give leave to Developers to take advantage and build over our beautiful fields and ultimately joining Woking and Guildford as one massive conurbation.

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

Attached documents:

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Comment ID: PSLPA16/1400  Respondent: 15400961 / Joan Plumtree  Agent:

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

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

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

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

I object to the lack of any immediate provision for doctors surgeries.

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

Attached documents:

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Comment ID: PSLPA16/1399  Respondent: 15400961 / Joan Plumtree  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of any evidence for the alleged housing numbers.

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

Attached documents:

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Comment ID: PSLPS16/2524  Respondent: 15400961 / Joan Plumtree  Agent:

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

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

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

I object to site A25 Gosden Hill Farm- massive over development of 2000 homes in the green belt.

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

Attached documents:

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Comment ID: PSLPS16/2526  Respondent: 15400961 / Joan Plumtree  Agent:

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

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

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

I object to site A35 Wisley Airfield- 2000 homes that are totally inappropriate and unsustainable development in the green belt.

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

Attached documents:

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Comment ID: PSLPS16/2530  Respondent: 15400961 / Joan Plumtree  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to site A43a the on and off ramp at Burnt Common/Clandon- this will increase traffic problems in the villages, not help them.

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

Attached documents:

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I object to site A45 The Talbot- this is over development in a conservation area.

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

Attached documents:

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I object to all erosion of the green belt and any sites for development included in the local plan will only give the developers a wedge to continue their fight to erode our green and pleasant land.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5608</th>
<th>Respondent: 15400961 / Joan Plumtree</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

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

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

I object to the removal of any villages from the green belt as this would lead to unsuitable development and the destruction of the integrity of our villages.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/936</th>
<th>Respondent: 15400961 / Joan Plumtree</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

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

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

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

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

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

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

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

I object to the last minute inclusion of new sites with less than 2 weeks notice.
I object to the late inclusion of site A43 Garlicks Arch.
I object to the limited consultation period.

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

Attached documents:

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Comment ID: PSLPS16/2532  Respondent: 15401281 / James Fowler  Agent:

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

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

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

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

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

Attached documents:

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Comment ID: PSLPP16/5613  Respondent: 15401281 / James Fowler  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a totally unrealistic number of houses for the country Janes to absorb.

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

Attached documents:

Comment ID: PSLPP16/5615  
Respondent: 15401281 / James Fowler  
Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5614  
Respondent: 15401281 / James Fowler  
Agent:

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

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

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

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

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

Attached documents:
Lack of substance in GBC's so called figures regarding housing needs, which exceed double previous figures of around 320 homes.

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

Attached documents:

Much more detailed information needed on infrastructure, including significant local road improvements to cope with the increase of 2 car families, and timing of road widening to the very congested A3, as well as details of the new intersection to cope with substantial additional housing which will directly affect BU.

Details required of proposed new sewers to cope with increase in population and increased water supply.

Lack of detailed information regarding the proposals for a road tunnel, before Gosden Hill Farm can ever be considered for...

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

Attached documents:
Total disproportionate size of proposed development in Burpham.

Disappointed in the limited consultation period for such a very important development programme proposed for the small village of Burpham.

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

Attached documents:

Comment ID: PSLPS16/2533  Respondent: 15404385 / T A Stones  Agent:

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

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

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

“Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings"

As someone who has lived in Surrey for many years I strongly object to the above plan. The proposed development is far too big and would have an enormous impact on the surrounding communities. In particular it would lead to greatly increased congestion unless extensive new roads were planned and they, in turn, would destroy the ambience of the vicinity. Many local services are already stretched and an increase in population of this scale would greatly aggravate matters.

I urge you to reject this application.

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

Attached documents:

Comment ID: PSLPP16/5618  Respondent: 15404449 / H Albertyn  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
My wife and I recently bought a property in west horsley near the Raleigh school. We moved from London to get away from all the rush but if all these new houses will be built in our area then it will ruin the whole experience. The Horsleys are not geared up for all this and the roads are already in a poor state so I cannot imagine what it will be like with all the additional traffic. The station car park will be overfull, we wont be able to see the local GP, there will be a scramble for school spaces and the whole village feel will be gone.

End of the day this area is outside the M25 and if more houses are needed then this should be built within that zone as most of these people will be commuting to the city.

I urge you to reconsider this proposal.

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

Attached documents:

Comment ID: PSLPS16/2539  Respondent: 15405409 / Louise Whelan  Agent:  

Objections to GBC Proposed Submission Local Plan

Although I live outside the Borough I keep my horse at stables in the Borough and visit regularly to go riding on the Bridleways across the Former Wisley Airfield and the surrounding areas in the Borough.

I OBJECT to the Proposed Submission Local Plan for many reasons and in particular for the following key reasons:

1. I object to the use of the Green Belt for over 70% of new The brownfield land in the urban areas should used for rebuilding.
2. I object to removing from the Green Belt the Former Wisley Airfield and neighbouring properties on its southern No exceptional circumstances have been established to justify removing the land from the Green Belt.
3. I object to the threat the Proposed Local Plan poses to the historic rural village of The urban 2,068 dwelling development is totally out of character with this village of 159 homes.
4. I object to the adverse impact on transport, local roads and road I specifically object to the increased volume of car traffic. The proposed development would result in around 4,000 additional cars on the roads. This will cause congestion on the narrow rural roads in Ockham and the surrounding areas. The danger from this traffic will be to cyclists and pedestrians, and particularly to horse riders. The increase in the already severe congestion on the A3 and M25.
5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area, the Sites of Special Scientific Interest and Special Nature Conservation.
6. I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am disappointed that my previous objections to the draft local plan have not been reflected in the latest draft.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. No effort has been made to demonstrate exceptional circumstances for the removal of any land from the Green Belt. I object that the green belt has been preferred over brownfield land in the urban area without taking notice of the response to previous consultations.
2. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
3. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
4. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
5. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
6. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
11. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”
13. Opportunity (3) should be common to all sites and is not unique to this site
14. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
15. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
17. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
21. I object to the fact that the council has failed to remove this site from the local plan despite receiving many thousands of objections from local residents and statutory consultees in two full consultations.
22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
23. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
28. I object to the Housing number which is unsound and open to legal challenge.
29. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

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

**Attached documents:**
• I object to a plan with 70% of new housing in the Green There is ample brownfield land in the urban areas of the 
Borough. That would reflect election promises to preserve the Green Belt.
• I object to the housing number of 693 houses per year; this estimate is far too high and is the result of hidden It 
cannot be justified.
• I object to the proposal to remove the Former Wisley Airfield (FWA) from the Green There are no exceptional 
circumstances to warrant removing the land from the Green Belt.
• I object to this urban 2,000 plus house development being placed in the historic rural village of 159 homes in 
• I object to the impact on transport, local roads and road The proposed development would result in around 4,000 
additional cars on the roads. This will increase the danger from traffic to horse riders, cyclists and pedestrians on 
the narrow rural roads in Ockham and the surrounding area. It will increase in the already very bad congestion 
on the A3 and M25.
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the 
site, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest 
(SSSI) and Special Nature Conservation Interest (SNCI).
• I object to the threatened loss of high quality

The Former Wisley Airfield, site A35, should be removed from the Submission Local Plan.

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

Attached documents:

Comment ID: pslp172/4110  Respondent: 15405601 / Joe Lethbridge  Agent:

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

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

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

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons 
including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by 
nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many 
constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain 
how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not 
capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 
objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood 
zone 2 and 3
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will 
increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

14. It is further from railway stations than any other identified strategic site

15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.

16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”

22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the Housing number which is unsound and open to legal challenge.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

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

Attached documents:
Objection to Guildford Borough Council Proposed Submission Local Plan

I live outside the Borough and keep my two horses at stables in the Borough. I visit regularly to ride on the Bridleways across the Former Wisley Airfield and the surrounding areas.

I OBJECT to the Proposed Submission Local Plan for many reasons, particularly the following:

1. I object to the proposal to allocate so much new housing to the Green Belt; it should be put on the brownfield land in the urban areas of the Borough. That would reflect election promises to preserve the Green

2. I object to the housing number of 693 houses per year; this number appears to me to be far too high, particularly in the context of Brexit

3. I object to the proposal to remove the Former Wisley Airfield from the Green There are no exceptional circumstances to warrant removing the land from the Green Belt. This area clearly fulfils an important objective of separating Ripley, Cobham, Woking and Horsley.

4. I object that this urban 2,000 house development would be totally out of place in the rural village of 159 homes in Ockham.

5. I object to the danger from its effects on transport, local roads and road The proposed development would result in around 4,000 additional cars on the roads. This will increase the danger from traffic to horse riders on the narrow local roads in Ockham and the surrounding area and increase the already severe congestion on the A3 and M25. Cycling would be dangerous.

6. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area, and the Sites of Special Scientific Interest and Special Nature Conservation Endangered ground nesting birds such as the Skylark and the Nightjar will be threatened by the development.

7. I object to the threatened loss of high quality farmland where crops have been grown for decades and probably for centuries.

8. I object to the continued inclusion of this site where a recent planning application has already been unanimously rejected by the Planning Committee.

I request that the Former Wisley Airfield, site A35, is removed from the Submission Local Plan.

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

Attached documents:

Comment ID: PSLPS16/2549  Respondent: 15405729 / Tiggy Hooper  Agent: 

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Submission Local Plan

Although I live outside the Borough I keep my horse at stables in the Borough and visit regularly to go riding on the Bridleways across the Former Wisley Airfield and the surrounding areas in the Borough.

I OBJECT to the draft Submission Local Plan for many reasons including those set out in the letter from Ockham Parish Council and in particular for the following key reasons:

1. I object because it proposes to use the Green Belt for over 70% of new housing. The brownfield land in the urban areas should used for rebuilding.
2. I object to the removal from the Green Belt of the Former Wisley Airfield (FWA) and neighbouring properties on its southern boundary. No exceptional circumstances have been established to warrant removing the land from the Green Belt.
3. I object to the threat the draft Local Plan poses to the historic rural village of Ockham. The urban 2,000 dwelling development is totally out of character with this village of 159 homes.
4. I object to the detrimental impact on transport, local roads and road safety. I specifically object to the increased volume of cars. The proposed development of 2,000 homes would result in around 4,000 additional cars on the roads. This will cause congestion on the narrow rural roads in Ockham and the surrounding areas. The danger from this traffic will be to cyclists and pedestrians, and particularly to horse riders. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25.
5. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI).
6. I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee. Please remove the Former Wisley Airfield from the Local Plan.

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

Attached documents:

Comment ID: pslp172/4114  Respondent: 15405729 / Tiggy Hooper  Agent:

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

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

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

I am disappointed that my previous objections (14th July 2016) to the draft local plan have not been reflected in the latest draft.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. No effort has been made to demonstrate exceptional circumstances for the removal of any land from the Green Belt. I object that the green belt has been preferred over brownfield land in the urban area without taking notice of the response to previous consultations.
2. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
3. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
4. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
5. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
6. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
11. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”.
13. Opportunity (3) should be common to all sites and is not unique to this site.
14. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
15. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
17. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
21. I object to the fact that the council has failed to remove this site from the local plan despite receiving many thousands of objections from local residents and statutory consultees in two full consultations.
22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
23. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
28. I object to the Housing number which is unsound and open to legal challenge.
29. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.
For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

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

Attached documents:

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**APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

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

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

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

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

Attached documents:

Comment ID: PSLPA16/1413  
Respondent: 15405857 / Raymond Mackay  
Agent:

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

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

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

1. APPENDIX D

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

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

1. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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

Attached documents:

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**Comment ID:** PSLPS16/2552  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

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

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

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

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1. **POLICY A25 - Gosden Hill Farm**

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

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

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

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

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

Note the following accident data:

2010 –2014 from Crashmap data

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

2015

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

Surrey Fire and Rescue deployed.
2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/2553  Respondent: 15405857 / Raymond Mackay  Agent: 

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

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

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

1. POLICY A43 AND A43a – Garlick’s Arch

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5651  Respondent: 15405857 / Raymond Mackay  Agent:

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

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

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

1. POLICY D3

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5658  Respondent: 15405857 / Raymond Mackay  Agent:

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

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

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

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/5659  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

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

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

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

1. **POLICY D4**

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

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

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/5647  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

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

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

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

1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5649   Respondent: 15405857 / Raymond Mackay   Agent:

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

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

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

1. POLICY E2

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

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/5650  Respondent: 15405857 / Raymond Mackay  Agent:

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

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

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

1. POLICY E5

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

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

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

Attached documents:

Comment ID: PSLPP16/5661  Respondent: 15405857 / Raymond Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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

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

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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

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

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

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

Attached documents:
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

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

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

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

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

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

**Attached documents:**

**Comment ID:** PSLPP16/5655  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

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

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

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

1. **POLICY H1**

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/5656  Respondent: 15405857 / Raymond Mackay  Agent: 

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

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

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

1. POLICY H2

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

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/5660  Respondent: 15405857 / Raymond Mackay  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. POLICY H3

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

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

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

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

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

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

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

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

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

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

Attached documents:
1. POLICY I1

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

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

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

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

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

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

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

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

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

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

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

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

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

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

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

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

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

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

Attached documents:

Comment ID:  PSLPP16/5653  Respondent:  15405857 / Raymond Mackay  Agent:

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

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

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

1. POLICY I2

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

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

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

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

Attached documents:

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1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

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

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

Attached documents:

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1. POLICY P2

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

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

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

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

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

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

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

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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

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

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

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

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

Attached documents:
**Comment ID:** PSLPP16/5646  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

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

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

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

1. **POLICY P4**

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

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

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

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/5643  **Respondent:** 15405857 / Raymond Mackay  **Agent:**

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

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

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

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

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

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

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

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

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

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

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

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5644  Respondent: 15405857 / Raymond Mackay  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: SLP16/944  Respondent: 15405857 / Raymond Mackay  Agent:
### Questions posed by Guildford Borough Council as part of its consultation.

**24.A. Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

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

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

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

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

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

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

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

Attached documents:
### 24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

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

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

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

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

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

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

**Attached documents:**

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### 24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

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

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

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

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

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

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

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

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessor, consider unsound.
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and...
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/947  Respondent: 15405857 / Raymond Mackay  Agent:

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

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

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

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

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

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

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

This is not cooperation by any definition.

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

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

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

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

Attached documents:

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Comment ID: PSLPA16/1417  Respondent: 15406017 / Eleanor Roberts  Agent:

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

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

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

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

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Comment ID: PSLPA16/1416  Respondent: 15406017 / Eleanor Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to

1. APPENDIX D

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

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

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

Attached documents:

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

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

1. POLICY A25 - Gosden Hill Farm

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

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

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

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

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

Note the following accident data:

2010 –2014 from Crashmap data
- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

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

2016

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

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

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

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

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

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

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

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

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

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

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

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.

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

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

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

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

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

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

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

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

**Attached documents:**

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

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

1. **POLICY A43 AND A43a – Garlick’s Arch**

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

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

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

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

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

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

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

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

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

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

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

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

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

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

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

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

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

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

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

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

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

Attached documents:

1. POLICY D3

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

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

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

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

Attached documents:
1. POLICY D3

I OBJECT to Policy D3 - Historic environment

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

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

Attached documents:

Comment ID:  PSLPP16/5691  Respondent:  15406017 / Eleanor Roberts  Agent:  

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

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

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

1. POLICY D4

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

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

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

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

Attached documents:

Comment ID:  PSLPP16/5675  Respondent:  15406017 / Eleanor Roberts  Agent:  

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5677  Respondent: 15406017 / Eleanor Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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

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

1. POLICY E5

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

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

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

Attached documents:

Comment ID: PSLPP16/5693  Respondent: 15406017 / Eleanor Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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

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

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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

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

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

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

Attached documents:

Comment ID: PSLPP16/5687   Respondent: 15406017 / Eleanor Roberts   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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

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

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

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

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

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

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

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

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/5684  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

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

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

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

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1. **POLICY H1**

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

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

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

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

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

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

Attached documents:

**Comment ID:** PSLPP16/5685  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

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

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

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

1. POLICY H2

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

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

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

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

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

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

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

Attached documents:

**Comment ID:** PSLPP16/5692  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

<table>
<thead>
<tr>
<th>1.  POLICY H3</th>
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</thead>
<tbody>
<tr>
<td>I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.</td>
</tr>
<tr>
<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”</td>
</tr>
<tr>
<td>The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.</td>
</tr>
<tr>
<td>The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.</td>
</tr>
<tr>
<td>The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.</td>
</tr>
<tr>
<td>The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)</td>
</tr>
<tr>
<td>The policy wording should be restricted to adjoining sites or define the concept of being &quot;closely related&quot;. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)</td>
</tr>
<tr>
<td>The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.</td>
</tr>
<tr>
<td>The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.</td>
</tr>
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</table>

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

Attached documents:
Comment ID: PSLPP16/5680  Respondent: 15406017 / Eleanor Roberts  Agent:

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

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

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

1. POLICY II

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5681</th>
<th>Respondent: 15406017 / Eleanor Roberts</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. POLICY I2

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

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

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

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

Attached documents:

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I OBJECT to poor air quality concerns (Policy I3)

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

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

Attached documents:
1. **POLICY P2**

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

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

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

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

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

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

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

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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

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

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

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

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

Attached documents:
1. POLICY P4

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

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

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

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

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

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

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

1. **POLICY S1**

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

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

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

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

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

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

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

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

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

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5671  Respondent: 15406017 / Eleanor Roberts  Agent:

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

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

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

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/948  Respondent: 15406017 / Eleanor Roberts  Agent:

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

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

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

I attach my response to the Guildford Borough Proposed Submission Local Plan.

Having considered the terms of the planning policy I OBJECT. This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I was born and grew up, until the age of 24, in the Guildford area. Having moved to London to work in recent years I have always considered Guildford and particularly Clandon to be an area I would like to return to raise a family. These plans would fundamentally change my view of Guildford and the surrounding areas. In addition, my parents still live in West Clandon and I therefore have a strong vested interest in the proposed plans.

I trust that the objections included in the attached are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

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

Attached documents:

Comment ID: SQLP16/949  Respondent: 15406017 / Eleanor Roberts  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

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

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

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

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

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

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

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/950</th>
<th>Respondent: 15406017 / Eleanor Roberts</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/951  Respondent: 15406017 / Eleanor Roberts  Agent:

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

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

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

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

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

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

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

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

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

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

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

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

Attached documents:

Comment ID: SQLP16/952  Respondent: 15406017 / Eleanor Roberts  Agent: 

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

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

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

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

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

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

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

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

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government. I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

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

**Attached documents:**

---

**Comment ID:** PSLPS16/2561  **Respondent:** 15406113 / Michael Hancock  **Agent:**

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

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

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

I write to object to the proposal to build on greenbelt land on the former Wisley Airfield.

Whilst I live outside the Guildford area I am very concerned at the impact it would have on the area:

Reasons for objections are:

I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside. The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.

Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.

I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.

The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion. The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

I object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

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

Attached documents:

Comment ID: PSLPS16/7462  Respondent: 15406113 / Michael Hancock  Agent:

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

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

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

I write to object to the proposal to build on greenbelt land on the former Wisley Airfield.

Whilst I live outside the Guildford area I am very concerned at the impact it would have on the area:

Reasons for objections are:

I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside. The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.

Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.

I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.

The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

I object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

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

**Attached documents:**
The inflated numbers of houses which have been arrived at through the “Strategic Housing Market Assessment”, the methodology for which is not revealed.

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

Attached documents:

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

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

I am writing to express my objection to much of what is proposed for the Horsley in the Guildford Local Plan.

I have a number of concerns regarding the plan:-

The proposal to remove the Horsleys from the Green Belt without proving “exceptional circumstances”

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

Attached documents:
Comment ID: PSLPP16/16601  Respondent: 15406145 / Paul Moore  Agent:  

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

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

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

The proposal to remove the Horsleys from the Green Belt without proving “exceptional circumstances”; 

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

Attached documents:

Comment ID: pslp173/123  Respondent: 15406145 / Paul Moore  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common 

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

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

I object to the unfair imbalance of the Plan across the borough. 

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become *even more* biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) *are within 3 miles of Send Marsh*, most of them on Green Belt. This is *grossly unfair* on an already overcrowded part of the borough.

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

Attached documents:

Comment ID: pslp172/1246  Respondent: 15406145 / Paul Moore  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34 

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

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

Attached documents:

Comment ID: pslp172/1244  Respondent: 15406145 / Paul Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

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

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

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which, I believe, is totally unacceptable.

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

Attached documents:

Comment ID: pslp172/1248  Respondent: 15406145 / Paul Moore  Agent:

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

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

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

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There appear to be no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]"
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

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

Attached documents:
Comment ID: pslp172/1242  Respondent: 15406145 / Paul Moore  Agent:

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

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

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

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11,350 homes proposed in the Plan, 40.6% (4,613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

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

Attached documents:

Comment ID: pslp172/1241  Respondent: 15406145 / Paul Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

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

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

The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

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

Attached documents:

Comment ID: pslp172/1243  Respondent: 15406145 / Paul Moore  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **The inclusion of site A58 Burnt Common, removes the need for A43 Garlick’s Arch**

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. *The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did]*”
2. *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

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

Attached documents:

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**Comment ID:** pslp172/1247  **Respondent:** 15406145 / Paul Moore  **Agent:**

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

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

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

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I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

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

Attached documents:

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**Comment ID:** pslp171/298  **Respondent:** 15406145 / Paul Moore  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

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

Attached documents:

Comment ID: pslp171/297  Respondent: 15406145 / Paul Moore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

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

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

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

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

Attached documents:

Comment ID: pslp171/295  Respondent: 15406145 / Paul Moore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

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

Attached documents:

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Comment ID: PSLP16/1420  Respondent: 15406177 / Leonilla Frost  Agent:

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

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

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

I OBJECT STRONGLY TO Policies A36, A37, A38, A39, A40, A41

- The number of houses being proposed is ridiculous, and will completely turn our beloved village into an ugly, urban sprawl.

- The congestion of new people and buildings will be unsustainable with our current infrastructure as well as schools and facilities

As stated, we moved from London out to the Horsleys less than a year ago, so that we could raise our children in the peace and beauty of our new home and its surrounding spaces. This proposal will completely ruin the "feel" of the entire area and would break the hearts of many loyal residents, including mine.

Many thanks for your time.

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

Attached documents:

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Comment ID: PSLPS16/2563  Respondent: 15406177 / Leonilla Frost  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY A35 (Wisley Airfield Development)
- Shouldn't be in the plan at all for the same reasons the Planning Committee rejected the identical proposal by Wisley Investment Properties

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

Attached documents:

Comment ID: PSLPS16/2562  Respondent: 15406177 / Leonilla Frost  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

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

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

I am writing for formally and strongly object to the 2016 Draft Local Plan. Please see my comments outlined below.
I OBJECT to Policy A36: Hotel, Guildford Road, East Horsley - site for approx 48 new homes
- My family and I regularly use this site for boarding and leisure, it would be terrible if it were replaced

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

Attached documents:

Comment ID: PSLPP16/5699  Respondent: 15406177 / Leonilla Frost  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

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

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

I OBJECT TO POLICY E1 & E3 (Employment)
- Too much encouragement to low added-value employment that is needed elsewhere
- Does not differentiate this from appropriate rural business
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/5697</th>
<th>Respondent: 15406177 / Leonilla Frost</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT to Policy AH1 (Homes for All) & Policy H2 (Affordable Homes)
- Home Prices are already expensive here (homes are not affordable) and creating new development will not solve this problem.
- Numbers presented are pre-Brexit and therefore not accurate

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

Attached documents:

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<th>Comment ID: PSLPP16/5698</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I STRONGLY OBJECT to Policy P2 (Green Belt)
- The environmental impact this development will have on the Green Belt will be severe. My husband and I escaped London to raise our children in this beautiful space and, at these proposals, it will be no longer.

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

Attached documents:

<table>
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<th>Comment ID: PSLPP16/5702</th>
<th>Respondent: 15406305 / Felicity Griffiths</th>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Although I live in Cobham. This plan would severely impact on our area. One of our main objects is the fact that Cobham is the nearest shopping centre to the proposed development. Cobham cannot possible cope with any increase in traffic - let alone some 5000 additional occupiers.

Also, there has been a suggestion that Cobham & Stoke d'Abernon station could be used as an alternative station to Effingham and Horsely. It is almost impossible to find a parking space in Cobham station carpark already. Any additional passengers would make the situation intolerable.

These are only two of many objections - but ones which would impact on our lives in Cobham.

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

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<th>Comment ID:</th>
<th>PSLPP16/16603</th>
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These are only two of many objections - but ones which would impact on our lives in Cobham.

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

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

Dear Sir / Madam

We object to the proposed large scale development planned for 1100 new dwellings and a 1000 place secondary school on two Green Belt sites in Normandy and Flexford. (Site A46) Current population 3000 inhabitants - proposal 100% increase.

**Insufficient infrastructure / amenities:**

- No retail shops, except for a music store
- No Post Office / No Bank / No Library
- No Public House / Restaurant
- Doctors surgery over subscribed resulting in residents travelling to Fairlands for appointments (approx distance 2.5 miles)
- Minimal local employment
- Lack of Infrastructure
- Existing traffic congestion and consequent safety issues
- Electricity supply already insufficient for local residents, there are many power cuts
- Broadband already insufficient for local need
- Flood area

**Green Belt**

Normandy and Flexford are located in the Green Belt. National policy retains strong protections against inappropriate development for valuable areas such as the Green Belt and states that planning should recognise the intrinsic character and beauty of the countryside.

**National Planning Policy Framework**

NPPF, paragraph 80 exists to safeguard the countryside from encroachment and to retain a Green Belt buffer to stop urban areas from merging. It also requires that Green Belt boundaries should be permanent (para 83) and to prevent urban sprawl (para 70) by keeping land permanently open.

The Guildford Landscape Character Assessment should be an important consideration in any review of the Green Belt.

**Special Protection Area**
The proposed development areas are within a 400 metres - five kilometres protection zone of the Special Protection Area (SPA). All sites require Strategic Alternative Natural Greenspace (SANG) to be found in advance before any development can be considered. The proximity of more people and the associated air pollution from the associated / anticipated car journeys is a threat to SPA status and the flora and fauna that dwell there.

Secondary School

There are 'no exceptional circumstances' to remove the proposed development site from The Green Belt. The secondary school is a new addition to The Local Plan as a strategy to enable this developer led proposal. There is no need for an additional secondary school whilst other secondary schools in the local area are substantially undersubscribed. This school would be an unviable project and a serious waste of tax payers money.

Infrastructure

Roads

Access to the proposed development sites would be via rural residential roads which are ill equipped to deal with any increase in traffic.

Glaziers Lane - unclassified road (060) - no continual footpath, pedestrians would have to cross the road at several places or risk walking in the road. Railway Bridge with limited visibility and hazardous station access. Route would be hazardous for cyclists.

Westwood Lane - C Class road (C16) rural residential road. No continual footpath. Single track road under Railway Bridge with 14'3" restricted height access. Route would be hazardous for cyclists.


These roads are already seriously overburdened and access is already restricted. At the northern end access onto the A323 is difficult; particularly from Glaziers Lane where traffic backs up substantially and where there have already been fatalities. At this junction volume of traffic and excessive axle weights caused sub terranean damage to gas and water services in 2013 leading twice to extensive, disruptive and costly deep repairs to stabilise the sub soil. The A323 has been identified in GBC's 'Options Growth Scenario Transport Assessment Report' as being at full capacity already. Extra development in the area will cause additional serious access problems and safety issues.

Railway Station - access onto Glaziers Lane - a tight turn northbound from the station with the vulnerability of unsighted vehicles coming over the Railway Bridge. Disabled access only on one side. Approximately 8 car parking spaces. Liable to flooding.

Flooding

Normandy and Flexford are situated on the slopes of the Hog's Back. They are subject to frequent flooding due to the high water table and clay composition soil. The drainage and sewage system are already inadequate for current needs. A development of this size would create further problems.

In summary we feel that this excessive scale development is inappropriate for this rural Green Belt area. Environmentally it is wrong. The infrastructure and amenities are inadequate to support a development of this size. No necessity has been
identified for an additional secondary school in the area while other local secondary schools are undersubscribed and can potentially increase in size on their present sites if the need ever arose.

We would wish you to take our concerns and objections into consideration.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2565</th>
<th>Respondent: 15406401 / P Gadd</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).

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

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

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

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.'s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5703</th>
<th>Respondent: 15406433 / Jean Bridger</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I wish to add, as one interested in the amenity of our more elderly members the need for a return of the town's shuttle bus service which enabled them to cope with our 'hilly' town. It really should be called the shopper's bus because, apart from helping elderly people - it would benefit the wider population as, as in the past it called at the Railway Station and the Bus Station before serving the top of the town, including Glive before returning via North St.

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

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

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

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

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

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

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

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

Attached documents:

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Comment ID: PSLPA16/1425  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2568  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5711  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5719  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5721  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5708  **Respondent:** 15406529 / David I Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5709  Respondent: 15406529 / David I Allan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5710  Respondent: 15406529 / David I Allan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5725  **Respondent:** 15406529 / David I Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5718  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/5715  Respondent: 15406529 / David I Allan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5717  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/5723</th>
<th>Respondent: 15406529 / David I Allan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY II**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5713  **Respondent:** 15406529 / David I Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **POLICY I2**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5726   Respondent: 15406529 / David I Allan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5707   Respondent: 15406529 / David I Allan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/953  **Respondent:** 15406529 / David I Allan  **Agent:**
Questions posed by Guildford Borough Council as part of its consultation.

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic
issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate? Please provide the following information being as precise as possible:
• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this
is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes
and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2571  Respondent: 15406593 / Guy Whatley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Garlicks Arch and its proposal to build the 400 homes and 7,000 sq meter industrial space. It does not seem to be supported by any evidence that it is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2572  Respondent: 15406593 / Guy Whatley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new slip roads for the A3. Traffic is very bad in the village and on many surrounding roads at most times of the day. Please do not make it even worse. Pollution from traffic fumes has been known to affect the health of the vulnerable, yet there seems to be no plans to alleviate any issues that will arrive from such an increase in the number of cars and lorries on the road to serve these houses and businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5731  
Respondent: 15406593 / Guy Whatley  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the type of houses that will be built. The council mentions ‘affordable housing’ but I am single and in my late twenties, have worked continuously since I left College at 17, but am in low-paid employment. I am unable to afford any type of housing, rented or otherwise in this area, and this plan to offer a small amount ‘affordable housing’ will not be affordable to me, or others like me. Someone has to man the shops and clean the floors of your offices, empty the bins and work in the coffee shops. Those people will not be able to live in the housing intended though.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5730  
Respondent: 15406593 / Guy Whatley  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the enclosure of the Green Belt within the planned village boundaries. This is the beginning of a process that will affect the natural environment in which we all live for the future.

I object to the destruction of and any planned development on the Green Belt surrounding Send village or in the Borough as a whole. I think Guildford has a responsibility to keep green spaces for generations to come, and should not simply build houses to line developers' pockets when there might be suitable sites in brownfield areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I have never written to object to anything before, but I object to the number of homes the proposed Local Plan intends to build in Send and in other areas in the Borough. I object to the fact that the number of homes planned seems to get a bigger number every time I hear about it, and the number now put forward will affect every aspect of our lives.</td>
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It is appreciated that some new housing is required in the area but it would appear that the planned number of houses required is grossly inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5739  Respondent: 15406849 / Anthony Forth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rather than looking at each individual site proposed in the Horsleys an overall view of the number of houses really required and the impact this will have regarding the Infrastructure, Schooling, Traffic and the Green Belt should be made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16609  Respondent: 15406849 / Anthony Forth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rather than looking at each individual site proposed in the Horsleys an overall view of the number of houses really required and the impact
this will have regarding the Infrastructure, Schooling, Traffic and the Green Belt should be made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of The Former Wisley Airfield (FWA/FM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, 36% of the Plan's new housing is proposed in the northeast of the borough (x% of which is allocated to TFM), an area that at present has only 11% of existing housing.

5. I object to the loss of the historic rural village of Ockham. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to assume a reduced reliance on private cars.
   2. The increased volume of car A proposed development of 2,068 homes would indicate an increase of approximately 4,000 additional cars on the roads.
   3. The impact this traffic will have on the narrow rural roads in Ockham and the surrounding areas, also including increased bus and lorry movements.
   4. The impact this traffic will have on local cyclists and pedestrians, due to the absence of any cycling paths and the lack of proper pedestrian footpaths (and the space to provide them).
   5. The impact on the already congested Strategic Road Network on the A3 and M25. A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. Infrastructure enhancements to the A3 and M25 would have to be completed before any development commences. Highways England has stated that they have no plans to even consider improving the A3 before 2020.
   6. The lack of suitable public The local rail stations of Effingham and West Horsley cannot cope with the proposed increase in passenger traffic.

   - I object to the fact that insufficient consideration has been given to the site's value from an environmental and ecological standpoint, in relation to the Thames Basin Heath Special Protection Area (SPA), the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI).
   - I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% both wish to see the historic features of the village maintained and to protect the village's green spaces, including the FWA/TFM.
• Lastly, I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We simply do not have the infrastructure to support even this infill development never mind the proposals contained in the local plan. Dr's Surgeries are very busy and appointments increasingly difficult to make.

Roads are totally inadequate with big lorries screaming through the village (there should be a weight limit).

Parking is very difficult most of the time and impossible some of the time. The flooding issue is not contained. Whenever there is heavy rainfall there is excessive surface water and flooding on the main roads. The main arterial road A3 is frequently blocked and the fact that we have the research Park, the university, the cathedral, and the hospital all pouring on to it at the same junction make it a no go area at certain times. This situation is not going to be helped by the proposals to build thousands of houses in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5763  Respondent: 15407393 / Margaret Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infilling is happening all the time and properties previously occupied by elderly people have been demolished and replaced by monstrous mansions. This is happening in High Park Avenue, and Glendene Avenue. Two bungalows on the latter have been either been made into houses by adding another storey or demolished and replaced by very large properties. These are not in keeping with the character of the Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5762  Respondent: 15407393 / Margaret Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no appetite for the proposals set out in the Local Plan for which will have serious incursions into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5765</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>There is a need for regeneration in some areas and some expansion in social housing especially in urban areas. But this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, which has a disproportionate effect on road traffic.</td>
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<td>Therefore I object most strongly as the overall plan is flawed and will lead to the devastation of our villages and our way of life forever.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Having read the published leaflet &quot;Write to Fight&quot;, I agree with every word regarding the above proposal and wish to add my name to the objection list.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Please find this letter / email supporting the removal of the above sites and that in my view any future planning will have a detrimental impact on the infrastructure being able to cope with such developments, i.e.:-

- Roads with increase in local traffic and the environmental damage - noise, pollution etc,
- Pressure on local amenities such as health centres / hospitals.
- Negative impact on Green Belt land.
- Increased pressure on domestic services such as the national grid, gas suppliers, sewage treatment etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1438   **Respondent:** 15407681 / Emily Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2584   **Respondent:** 15407681 / Emily Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5778   **Respondent:** 15407681 / Emily Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5788  Respondent: 15407681 / Emily Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5785  Respondent: 15407681 / Emily Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1443  Respondent: 15407809 / Valerie Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2] Secondly I object to the total lack of any substantial information on providing adequate infrastructure for the developments proposed. It is simply not good enough to make bland statements about infrastructure, since, before any development of the frightening level proposed is considered, fully costed and detailed infrastructure plans for items such as new schools, Medical Centres etc. must be clear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2589  Respondent: 15407809 / Valerie Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8] Eighthly I object to the proposed development of the Wisley site and am astonished that GBC has even considered including the site in the Local Plan, especially since planning has already been refused. Whilst I agree that the Wisley developers have included much needed extra infrastructure, the whole plan completely fails on the traffic issue. Our local roads are already very congested and the roads around the M25 and A3 junctions are mostly chaotic. It would be absolute madness for GBC to consider this plan unless it was for a very small number of houses which did not create the risk of further traffic chaos. Under no circumstances can this site be considered without careful and close discussion with local Wisley and Ockham residents, in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5800  Respondent: 15407809 / Valerie Platt  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>3] Thirdly I strongly object to the use of the brown field sites for industrial or office development. There is no justification whatsoever to show that there will be an adequate demand for such space. Indeed it seems highly unlikely that such space would be able to be let or sold in our high cost area. Therefore the reassurances made by GBC officers, after the last consultation, to use brown field sites for housing have been ignored. This is of such importance that I find that this complete lack of attention to this point is insulting.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>6] Sixthly I object to the unacceptable density of the proposed housing for West Horsley. This is far higher than the current density and it is likely to lead to houses totally out of character with the existing village and no sustainability in terms of schooling, drainage, roads capacity, shops and public transport.</td>
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</table>
7] Seventhly I **object** to the early exhibition of a SANG in Longreach, West Horsley by a Company, Greenreach Ltd, which is totally owned by developers. How dare the GBC support the concept of this exhibition when we have many wonderful areas of country for recreation? To put this artificial plan forward before the Local Plan has completed its consultation is disgraceful, especially since it has been created by Developers who clearly expect the GBC to favour them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/5801  **Respondent:** 15407809 / Valerie Platt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

4] Fourthly I strongly **object** to the plan to inset several rural villages from the Green Belt. The GBC seem to have completely forgotten that people who live in the rural villages in the Borough have chosen a particular lifestyle to live in a rural community and the latest local plan would ruin many people’s lives. The policy is grossly unfair to these people and the local plan should be completely altered so that development only occurs in brown field sites and on the urban edges of main towns. In addition the protection granted to residents for future development would be undermined giving villagers limited ways in which they could prevent unacceptable development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/5795  **Respondent:** 15407809 / Valerie Platt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

Whilst I will leave official bodies, such as Parish Councils, to comment in more detail on the specific Policy Issues, I now set down my principal concerns.

1] First and foremost I **object** to the number of new homes proposed for the Borough. By every calculation this target would increase the population of the Borough at a rate higher than at the latest 10 year period as measured by the censuses. Furthermore this figure is totally unsustainable by any measure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
5] Fifthly I **object** to the specific plan relating to my village, West Horsley. It seems utterly incredible that GBC could propose such a plan for a village which is probably the most rural village after East Clandon. Not only is the proposed increase of 385 houses over four sites unbelievable but it is also an increase of 35% which is more than any other location. Whilst I understand that any Neighbourhood Plan has to fit into the Borough Local Plan, a recent survey of the whole village showed that residents felt that only 40 houses were needed [or could be coped with sustainably - no shop, no Post Office, difficult parking in East Horsley, railway station parking at capacity and limited Bus Service] in the same period. Even allowing for the GBC needs, this shows just how distorted the numbers are in Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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5] Fifthly I **object** to the specific plan relating to my village, West Horsley. It seems utterly incredible that GBC could propose such a plan for a village which is probably the most rural village after East Clandon. Not only is the proposed increase of 385 houses over four sites unbelievable but it is also an increase of 35% which is more than any other location. Whilst I understand that any Neighbourhood Plan has to fit into the Borough Local Plan, a recent survey of the whole village showed that residents felt that only 40 houses were needed [or could be coped with sustainably - no shop, no Post Office, difficult parking in East Horsley, railway station parking at capacity and limited Bus Service] in the same period. Even allowing for the GBC needs, this shows just how distorted the numbers are in Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Guildford Local Plan 2016 Consultation**

I am responding to your request for residents of the Borough, and other interested parties, to make their views known on the latest Draft Local Plan.

My first comment is that I am deeply shocked to see that little or no attention has been paid to the comments made by a significant number of residents in the last consultation. The overwhelming local view that the Green Belt must be maintained at all costs, and that brown field sites should be used for a large part of the housing needs, has been completely ignored.

Once again the method of communicating to Home Owners and Occupiers is totally unacceptable. In January 2014, I had sent a suggestion of how the Borough might **directly** write to **every** Home Owner or Occupier so that they are fully aware of the proposals. This is because so many key people were not aware of the plan or the needed action. I had an email from the then Councillor in charge of the Local Plan agreeing that their consultation must be improved. This has not been done and so many people may be disenfranchised.

These points above show that the much needed democracy to progress such an important plan is destroying the credibility of the process.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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<td>Ninthly I object to the whole 2016 Local Plan since firstly the consultation process is undemocratic, secondly because much of the information is inaccurate or misleading, thirdly most of the plan has been shown to be unsustainable with inadequate addressing of the infrastructure needs, fourthly no convincing argument for “exceptional circumstances” has been made to wreck the Green Belt which is a vital feature of our Borough.</td>
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<td>In conclusion I urge the GBC to rethink the Local Plan so that it respects the views of local residents and listens carefully to their views.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the procedural short-comings in the development, consultation and delivery of this Plan, which has been based on highly questionable ‘evidence’ that should now be revisited in light of the recent EU Referendum. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]</td>
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Comment ID: PSLPS16/2593  Respondent: 15407937 / Lyn Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to POLICY A43, adding a further 400 houses (this on top of the already unsustainable 13,860 dwellings) and 7,000 square meters of commercial premises, all of it on Green Belt without any "exceptional circumstances". The way this site has been introduced without the required consultation serves to confirm that GBC planning members are thumbing their noses at proper procedure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2594  Respondent: 15407937 / Lyn Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new A3 interchange at Burnt Common which will generate considerable traffic volumes on to an already overloaded road network, bringing commuter traffic to a standstill and massively increasing air and noise pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5809  Respondent: 15407937 / Lyn Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to POLICY P2 which removes Send from the protection of the Green Belt, without justification and no “exceptional circumstances”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/5813</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree with the local plan. I think as well as affecting walks on Green Belt land. It will affect the wild animals houses on Green Belt. Why build hundreds of houses on grass? I do not want the local plan to build houses on the Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15408001 / Lesley Bond</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Normandy. I have lived here for 40 years.

I strongly object to the disproportionate scale of the proposed new A46 development. In 2014's consultation is was safeguarded. Exceptional circumstances have not been demonstrated or approved by the inspectorate. A 100% increase in the number of homes in the village will destroy the natural environment. The fundamental aim of "green belt" policy is to prevent urban sprawl by keeping land permanently open. GBC is ignoring Past verdicts of planning inspectors that the green fields of Normandy (A46) contribute to the openness of this area of Surrey Green Belt and to the panoramic view of the green fields to the Surrey Hills AONB. Development should not be approved except in very special circumstances (NPPF).

GBC is required to demonstrate "exceptionally Circumstances' to justify the release of sit A46 from Green Belt. There is no clear evidence of these exceptional circumstances within the LP.
I also object to the proposals because the extra traffic generated by so many new homes will cause chaos. The A323 is already often congested, especially at peak times in the mornings and evenings. It is regularly gridlocked when accidents occur in Guildford, on the Hogs Back and Aldershot. The minor roads - Glaziers Lane and Westwood Lane will not be able to cope with the extra traffic which the extra 1100 homes will generate. The railway bridges on both roads will be put under enormous stress. There will also be a massive increase in exhaust pollution of NOX and CO2. This cannot be desirable. Planning Policy has not fully considered the location of the site & the traffic impact A46 will have on this rural community.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3229  **Respondent:** 15408001 / Lesley Bond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the withdrawl of Policy A46

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/3230  **Respondent:** 15408001 / Lesley Bond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the withdrawl of Policy A47

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/2596  **Respondent:** 15408065 / H P Finnamore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

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5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5812</th>
<th>Respondent: 15408097 / Rolf Horst</th>
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</thead>
<tbody>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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The volume of traffic has increased with an alarming rate over the last 15 years - not only due to many newly built houses (infill) but also due to Satellite Navigation systems sending traffic from the A246 through East Horsley to the A3 and A246. The roads are barely wide enough to accommodate the heavy load of lorries, coaches, large 4x4s and other traffic. Very often there is nowhere to park in the village as the car park behind the shops fills up very rapidly these days. So THE HORSLEYS ARE FULL.

I therefore strongly object to the horrifying idea of building any more houses in or around the Horsleys.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16670  Respondent: 15408097 / Rolf Horst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure of our villages cannot cope with many more residents. The schools are full, the Doctor's surgery is almost impossible to get an appointment with. The trains into London are to full capacity as is the parking facility at the train station.

The volume of traffic has increased with an alarming rate over the last 15 years - not only due to many newly built houses (infill) but also due to Satelite Navigation systems sending traffic from the A246 through East Horsley to the A3 and A246. The roads are barely wide enough to accommodate the heavy load of lorries, coaches, large 4x4s and other traffic. Very often there is nowhere to park in the village as the car park behind the shops fills up very rapidly these days. So THE HORSLEYS ARE FULL.

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Attached documents:

Comment ID: PSLPP16/5811  Respondent: 15408097 / Rolf Horst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

One of the main reasons my wife and I moved to East Horsley 18 years ago was to enjoy the protected Green Belt which is so important to all living here and we would vehemently campaign to keep this protected status for our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2597  Respondent: 15408129 / Honey Jenkins  Agent:
Dear Sirs

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Attached documents:

Comment ID: PSLPS16/2600  Respondent: 15408321 / Tallulah Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2601  Respondent: 15408353 / Pippa Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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* I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

* I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

* I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

* I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and a further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational,medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Summary

I object to the local plan for the above reasons.

Also, and importantly, I have not seen any justification for the increase in numbers of houses required and presumably that justification will now be less with the decision to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2603  Respondent: 15408385 / Olga Sitkovetsky  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wisley

A development of 2000+ houses at Wisley is again a breach of the Green Belt that is in place to protect the country from just such development.

In addition to the 533 proposed houses for the Horsley villages many of the new residents in the Wisley new town/village will clog the roads and parking in East and West Horsley and surrounding villages. It is daft to assume all the residents will leave this village via the A3. They will of course use the local amenities. It will be gridlock.

As the development for Wisley was very recently rejected by GBC for numerous, and what appear to be insurmountable, reasons why is this Wisley development still in the Local Plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5815  Respondent: 15408385 / Olga Sitkovetsky  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Facilities
The huge additional housing both in numbers and percentage terms will have a significant impact on the infrastructure. Specifically:

- **Doctors Surgery** – I have an 88 year old mother and making an appointment at the surgery is very difficult. If an additional 533 houses are built in the Horsleys, which is a huge percentage increase it will become impossible. 
- **Parking** – Is at its limit at both the station and at the East Horsley shops and there is no obvious way of extending this to cope with the additional cars from 533 extra houses. 
- **Roads** – All the local roads are country lanes either without pavements or single sided pavements. Again the area will not be able to cope and there is no scope for improvement. 
- **Schools** – Are at full capacity so there is no where for additional children to go to school at either primary or secondary level. 
- **Surface water flooding** – Is particularly serious in East Lane and elsewhere in the villages of West Horsley and East Horsley. East Lane is flooded every year during storms. The development either side of East Lane will make this worse as will the developments elsewhere in the Horsley villages. 
- **Water supply** – Is very weak.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5814</th>
<th>Respondent: 15408385 / Olga Sitkovetsky</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Objection to the Local Plan**
I wish to strongly object to the Local Plan on a number of grounds.

**Green Belt**
I object to the West Horsley being taken out of the Green Belt. The development sites A38, A39, A40 and A41 are clearly areas which should not be included in the Settlement boundary. They are clearly part of the ‘Green Belt’ countryside that surrounds West Horsley. 

In addition A41 is starting a creep that will inevitably lead to the joining of West Horsley village to the Northern part of West Horsley and East Horsley. 

All of this also has a detrimental impact on the rich wildlife with much of that habitat and wildlife corridors being removed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2602  Respondent: 15408417 / Nikki Kerr-Moller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SN Ci).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI L) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously. Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1478  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA repory methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, I also undertsand that is it based on 'commercially confidential' modelling assumptions that cannot be checked, reviewed or audited independently. I note that there has been no transparency to this evidence base and it is therefore impossible to assess its accuracy. I firmly believe that this has been conducted in an undemocratic fashions and is not appropriate for consultation of the Plan.

The National Plannig Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that all my objections made above are fully taken into consideration and that the Plan is withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2684  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I object to the inclusion of the land at Garlick's Arch, Send Marsh/ Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. It has not been confirmed to why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this.

I am also concerned that the fields behind my property will be used as site access/egress with a typical works compound, and of course the construction site, for the entire works period. Given, its' proximity this will see a 24 hour security fenced and lit compound. Movements of heavily construction traffic within a short distance from my house, will happen 5 or 6 days a week to amount to thousands of movements of material away and deliveries. My whole family will suffer the consequences of noise pollution, dust pollution, and construction activity for the duration of the development.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This increased funneling will cause immense damage to those arwas with narrow roads, all increasing the possibility of road traffic accidents.

This Plan does not address the needs of local communities of the Borough in this regard. Ther has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5909  Respondent: 15408513 / Brian Rawling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8. I object to the damage of the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient Oak trees. It is well documented that Oaks provided a habitat rich in biodiversity, supporting more life forms than any other native tree species which each Oak housing hundreds of species of insect, supplying many native birds with an important food source. I autumn mammals such as badgers and deer take advantage of the falling acorns. Development will see the destruction of these trees and further damage to the local biodiversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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5. I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable and less disruptive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
6. I object to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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7. I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of several successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them wish to leave their premises. The Plan does not promote rural employment, rather it will result in the loss of existing local rural business.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in an around our villages. The Plan does not provide and achievable strategy for improving capacity on these local roads.

Furthermore, a large number of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition, and have not been tendered. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested, with traffic accidents more likely to happen. I mention this as Surrey has become a mecca for cycling, particularly at weekends hundreds of cyclists passing through Ripley, Send and Clandon on the way to the Surrey Hills. Trade to local businesses such as the coffee shops in Ripley have benefitted from this pursuit, along with employment and wealth creation form local Small to Medium Enterprises (SME’s). I am like many a keen cyclist, and I am concerned that the Surrey Hills will be damaged beyond recognition should this development be brought forward, thus losing it's brand value, attraction and status. With no proper cycle lanes on narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road traffic accidents involving cyclists as a result of the development proposed under the local plan. This comes at a time when many of the local schools are trying to encourage cycling within their School's Travel Plans (STP's).

Most of the local rural roads also do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. To example, in Clandon, where footpaths do exist, they are often very narrow in places with construction lorries mounting pavements in order to pass, and this has been already well documented by West Clandon Parish Council.

10. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, I share the view that my family and I along with all other existing residents’ in the locality will see our quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site. The farm land around the South bound extension, floods regularly. Should this development go ahead, I expect that the flood waters will be pushed close to my property and will present greater risk of flooding.

I also note that without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and very likely be overwhelmed. It is well documented that many local services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I am also concerned with the general reduction in future Police funding (Surrey Police identified that it needed to save £28.4m over the four years of the spending review between March 2011 and March 2015). Savings have been made, but their scope with new developments will increase, creating extra pressure. This will have further impact to all local residents as local Police will have 13, 860 new homes during the plan period.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5966  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Reviewing Highways England material, suggests that it has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5970  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I object to poor air quality concerns (Policy I3)

As a local resident, with a young family I am acutely concerned, with air quality and the levels of harmful motor transport emissions. Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." As this development, is within 400m from my house, I ask GBC to detail how they achieve this? This proposed development, particularly in the north east of the borough will lead to considerable further congestion, and emissions in traffic will mount up waiting for the lights to change. This will be particularly acute to nearby properties such as mine. This will have a detrimental health effect to my children when they play in their garden.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5885  **Respondent:** 15408513 / Brian Rawling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

There is a real danger that the loss of this Greenbelt will result in a mess of urban sprawl and the neighbouring villages merging into one another. The significance of this development, will result in the character of these villages being lost and the natural habitat and countryside being encroached.

I am bemused to why the existing brownfield site just to the south of the site at Burnt Common, has not been considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5892  **Respondent:** 15408513 / Brian Rawling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2- having between a 1% and 0.1% annual probability of river flooding. As a local resident, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay (in Winter 2013 to the depth of 2 feet in places). Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
villages, this will force more motor vehicles to what is already congested roads. These sites are unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve wider infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution.

With the proposed development coming within 400m of my property, I am acutely aware of the destruction, the increased noise, pollution and damage this development will have to the local habitat. This will perhaps, affect me more than most but all residents in Send, Clandon and Ripley will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5882  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present there three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only 5 miles. It will in effect create a sprawl, with the merging of 'identities' of the surrounding villages, with no delineation between one village and the next.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. This development will have a permanent and detrimental impact on each of these communities, should this Plan be approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2604  Respondent: 15408545 / Michael J Lewis  Agent:
I refer to latest addition to the local plan for Send's future development. This site would obviously be built on Green Belt Land which is totally unsuitable for this area.

Object for the following reasons:

1. I object to - Send Hill is a very narrow lane and where this site will be there is absolutely there is no room for vehicles to pass each other, therefore the road would have to be widened, at a considerable cost, to enable lorries and caravans to go back and forth on this site. The sewage in Send Hill has always been a problem with excess effluence, there is considerable back up so our properties has to be cleaned out on a regular basis, this will only be exacerbated by any additional properties.

1. I object to - The private owner part of this development which is opposite our property has become a haven for wildlife with deer and there young, badgers, rabbits, bees, owls, and various species of birds.

1. I object to - When this piece of land was sold to the present owner there was a Covenant that a corner of this plot should not be disturbed as it was used as a dog and pet. Building on this plot surely is breaking the lease.

1. The GBC area of this development has been used for many years for recreation, children and dog walking.

1. I object to - Previously the land was used and a waste. This infill was extremely toxic and has been vented over a period of time. If building was to take place, surely this would disturb any existing toxicity present which could result in serious problems!

1. The Cemetery enlargement in Send Hill has now been offered to all denominations which will increase both traffic and parking problems adding yet more chaos from your proposed development. If you take in consideration the traffic from schools and their latest rebuilds, this will increase the traffic problems. By the riding stables on Send Hill the road gets even narrower and very dangerous leading into Potters Wood.

I object to the proposed alterations to the Local Plan site - for the following reasons.

I object to - The proposals are being built on what was green belt and seems extremely underhand by moving the green belt boundary lines. This goes against the Sectary of State guide lines and the Government planning Minister.

A letter received from Sir Paul Beresford in July 2014, stated that only in exceptional circumstances could properties be built on green belt land. This proposal could be built on brown fields and do not show special reasons for green belt building.

The Send Hill development is in a complete residential area and could not cope with a increase in traffic, including commercial lorries being used by travellers.

A copy of this letter is being sent to the Secretary of State, Ministry of Planning and our local Member of Parliament and Prime Minister, David Cameron.

I want my comments to be seen by the inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/1449</th>
<th>Respondent: 15408609 / John Perrot</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel GBC's Housing Assessment report is flawed and the specialist company who carried out the report for GBC were certainly not impartial. There is no concrete evidence to demonstrate that we need in excess of 13,000 houses to be built in the Borough, particularly after Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The M25, A3, A247 and other local roads are busy roads with daily traffic jams occurring - the roads cannot take any more traffic. The infrastructure is not in place to facilitate any more houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object most strongly to Green Belt land being used for future building. Green Belt is land which should never be built on. The countryside must be protected for the younger generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5828  Respondent: 15408609 / John Perrot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposed development at Garlick Arch, Wisley Airfield, Gosden Hill and Clan don Golf course. These large developments will have a profound effect on the Clandons and surrounding villages and countryside. The traffic situation locally is impossible already and will become much greater if any of this proposed development goes ahead. The Clandons and other small villages will just merger and become a suburb of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1448  Respondent: 15408641 / Robin Thorogood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to comment on and object to the Local Plan.

In particular, Iam concerned about a number of the proposals as they impact East and West Horsley (the "Horsley's") and the surrounding area.

Quite apart from the fact that it is absolutely clear that the residents are totally against the Horsley's being removed from the Green Belt, the proposal to increase the number of dwellings in West Horsley by around 35% is excessive in the extreme.

In this regard, I understand that the National Planning Policy Framework must take account of and respect the character and density of housing in the area of new residential development and the quantity of new dwellings be limited by the availability of infrastructure and local facilities.
Many residents like me have made their home in the Horsley's attracted by the village atmosphere but the high density developments proposed for West Horsley would forever change this.

In the 30 years I have lived in West Horsley I have seen a steady increase in the numbers of new residents moving to this area.

In doing so, services such as the Medical Centre have already become so busy that it is often difficult to make an appointment. Parking at the Medical Centre is also at a premium.

Access to parking in the area of the East Horsley shops is already often extremely difficult with the current volume of shoppers and traffic and the Horsley railway station parking facilities, once adequate, are generally pretty full.

Furthermore, the car park at Effingham Junction Station, which in the past could be used as an alternative to Horsley Station, is regularly full.

The proposed developments will result in traffic movements becoming significantly greater following the inevitable increase in the number of vehicles on the road. Consequently, traffic using the local roads are likely to come to a grinding halt at the times when travellers are attempting to get to or return from the local railway stations to get to work or school.

It must be clear to anybody that the increase in population resulting from the proposed developments would generate a huge increase in traffic in the area which would be significantly exacerbated by any development of Wisley Airfield.

I believe that the road capacity in the Horsley's is totally inadequate to support these plans.

I understand there are other issues which have been raised by the local Parish Councils which include concerns about road and transport infrastructure for West Horsley as well as concerns about the existing pressure on sewage and the local wastewater network's ability to support the demand from the proposed developments.

It seems to me that Guildford Borough Council has simply decided to remove the Horsley's from the Green Belt and build an inappropriate and excessive number of houses in West Horsley without any justification.

Given the scale of the proposed development in West Horsley which would lead to the unnecessary end of village life and an adverse impact on the infrastructure across the Horsley's I object to these proposals in the strongest terms.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Clandon

Our roads are heavily congested already and the risk of flooding is very great in this area and the Wey and Thames Valleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5831   Respondent: 15410433 / E Grant   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Green Belt land being used for building houses and commercial development, Green Belt land is designated 'Green Belt' to protect open green spaces for future generations.

I object to all the major developments in the Clandon are proposed in the Local Plan. There is no evidence we need all these houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16687   Respondent: 15410497 / Nick Owen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to your proposal to remove Chilworth, where I grew up, from the Green Belt. We have quite enough outer London sprawl as it is; and any economist can explain to you why you can’t build your way out of a housing shortage, just as you can’t build your way out of road congestion (a lesson we learned 20 years ago).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1457  Respondent: 15410849 / G Reid  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am most concerned over the proposals contained in the Guildford plan in relation to West Horsley, and would cite the following among my main concerns:

I am very much against the higher density of the proposed new homes in West Horsley which would spoil the whole character of our village.

It is clearly unreasonable that any major increases in the number of homes in West Horsley should be considered without major parallel improvements to- and expansion of much necessary infrastructure- much of which is already operating under severe pressure.

I cannot see any valid reason or any 'very special circumstances' as to why West Horsley should be taken out of the Green Belt and am opposed to any such measure.

I also have real concerns as to the validity of many of the assumptions upon which the Guildford plan is based- particularly in relation to West Horsely.

I trust the above points are sufficient to illustrate my opposition to the currently proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1460  Respondent: 15411041 / V Reid  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am opposed to many aspects of 'The Guildford Plan' concerning West Horsley- especially to the following.

1) I was shocked at the proposed removal of West Horsley from the Green Belt, particularly in the absence of any stated "exceptional circumstances" to justify such a main change to our village.

2) I object to the disproportionately high increase in the number of proposed new homes in West Horsley compared to similar areas in the Guildford Plan.
3) Local facilities—such as the medical centre, schools of public transport—all already overstretched—would NOT be able to cope with any significant increases in the population of West Horsley.

I could easily, yet again, add to the above objections to the plans, but would urge you to reconsider and amend it in the light of objections such as those noted above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16715  Respondent: 15411137 / Jacky and Jon Hurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are objecting to the quantity of new houses being proposed in the Horsleys!

It is already a very congested area with limited parking in the village and overstretched services for schools and medical.

The drainage is a huge problem with flooding including sewage often occurring

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2620  Respondent: 15411425 / Andrew Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no
funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally, I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the area. It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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All this to say nothing of the devastating impact it would have on a small rural village being transformed into something just short of urban! I will not here endeavour to point out the obvious impact on the beautiful countryside, lying as it does in an area of Outstanding Natural Beauty on the North Downs. I believe that any visitor to the village would agree it would be utterly abhorrent to encroach on the countryside around West Horsley! Surely Beatrix Potter, celebrated children’s author who used to stay at a cottage in the village with her uncle and aunt and did many of her paintings and wrote some of her books there, will be turning in her grave at the prospect of these plans for turning West Horsley into suburbia!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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As I see it, it is the task of the council to protect the environment for its residents, not facilitate the cruel scarring and destruction of the kind of the beautiful landscape and lifestyle that makes our borough desirable as a tourist and visitor destination. Before you vote on this proposal, please visit our village to see with your own eyes how profoundly ill-considered these proposals are!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5888  Respondent: 15411457 / Emily Beynon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Amenities such as shops, schools, post office, medical centre (East Horsley) and public transport (Horsley station - the car park of which is already over-capacity!), to say nothing of the narrow, poorly maintained roads through the Horsleys (already too dangerous for me to consider cycling or walking and regularly closed due to flooding) would be pushed beyond breaking point!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16720  Respondent: 15411457 / Emily Beynon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Amenities such as shops, schools, post office, medical centre (East Horsley) and public transport (Horsley station - the car park of which is already over-capacity!), to say nothing of the narrow, poorly maintained roads through the Horsleys (already too dangerous for me to consider cycling or walking and regularly closed due to flooding) would be pushed beyond breaking point!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16723  Respondent: 15411457 / Emily Beynon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

But above all, I beg of you to please stand by your **pledge to protect the Green Belt** and DO NOT ALLOW these plans to go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposal made in the current Proposed Local Plan to build hundreds of new houses in the green belt village of West Horsley.

Agreed, there is a need to create more small, affordable homes in the borough, however proposing an increase of some 50% in the number of properties in this small rural village seems, if I may say so, to border on madness! Surely a far better solution (or rather multiple smaller-scale solutions) could be sought on brown field sites or in the conversion of abandoned commercial properties.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>PSLPS16/2626</th>
<th>Respondent:</th>
<th>15411553 / Robert Burton</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also
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3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

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- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to object to the proposed development of Wisley Airfield on the grounds that:

- it should remain as a protected green belt area.
- there are insufficient services such as schools, shops and doctors surgeries for a development of its size.
- the impact of increased traffic on the surrounding country lanes and on the already dangerous confluence of the M25 and A3 should not be underestimated.
- lack of public transport, buses and trains and lack of commuter parking at existing stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support the objection made by WAG as well as the objections made by Ockahm/Ripley/East Horsley parish councils.

I object particularly to the loss of the publane footpath which cross the Wisley Arifiled, I played some part in getting the footpath instated and sedicated.

I object any plan which is dissected to violate the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16724  Respondent: 15411873 / Roger Alford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am alarmed by what I have read about the plan for the prospective development of Guildford.

The scale is surprising and the failure of GBC to apply any constraints to housing numbers (like other councils) is hard to understand. The prospective worsening of traffic problems in the town (where the new Waitrose has already made the traffic in York Road slower and more congested) is particularly worrying.

It is hard to understand why our council has opted for change on a scale which appears to be directly to the disadvantage of existing residents. This whole plan needs to be looked at again. We need a sensitive and measured approach to Guildford’s future development, not over-ambitious gigantism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1467  Respondent: 15412001 / S Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The plan is not sustainable and there is no 'non biased' specialist report advising of the need for 13,000 plus houses in the Borough, particularly now the country has decided to Brexit. I understand your Advisors work for the Property Developers in the Guildford Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/5911</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the development at Garlick Arch, the development and the major development at Gosden Hill. The Clandons are villages separated from the sprawl of Guildford by the Green Belt land at Gosden Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The road infrastructure is inadequate to cope with any further development in the area. The A247 running through West Clandon is narrow and dangerous and is overloaded with traffic, before any major housing or business developments take place in the area. Traffic is always congested at peak times and many other times heading north on the A3 with cars trying to access the M25. Regularly the M25 is closed and all the traffic comes through the Clandons. Also Stag Hill is congested each night.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5898  Respondent: 15412001 / S Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the Proposal within the Local Plan to use Green Belt land for major development. The Clandons were my home for some 25 years and I visit 2 or 3 times each week and I want my children to enjoy the Green Belt areas around the Clandons which I enjoyed when growing up. Green Belt was designated “Green Belt” to protect our countryside for future generations.

I object to areas of East Clandon becoming a settlement area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5901  Respondent: 15412001 / S Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to major large housing estates which are in an area of risk of flooding or causing flooding to others, in the Mid Thames area. Each and every new large building estate just makes the problem worse and the major flood relief programme on the Mid Thames was abolished a few years ago by the Government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5906  Respondent: 15412001 / S Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would suggest the Local Plan is not sustainable

The Local Plan is driven by greed. the Borough Council wanting to develop more businesses to obtain more money.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5943  **Respondent:** 15418753 / Scott Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to formally object to the removal of green belt protection from a number of villages in the Guildford area, as proposed in the Guildford Local plan 2016.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2643  **Respondent:** 15418817 / Ed Pipe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch, as this area regularly floods and building additional housing there would mean that water needs to go somewhere else, causing further flooding. It is also an area of ancient woodland. With proper use of brownfield sites, this green belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the A3 intersection at Burnt Common because the traffic along Send Barnes Lane from the traffic lights is already overstretched on a regular basis. The traffic are often gridlocked with traffic backing up from the Burnt Common roundabout all the way back into Send. It can take 15 - 20 minutes to drive less than half a mile some mornings to get from Send to Burnt Common. I walk a lot and the car fumes are horrible, not to mention the noise not just from engines but from car horns of disgruntled motorists from the endless queuing. Often the lights change and nothing has moved at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7509  Respondent: 15418849 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 travellers’ pitches at Send Hill. I live close to the traffic lights at the end of Send Hill and Send Hill is not built to cope with much traffic. It is already extremely congested and the other end of the road is single track and not suitable for lots of traffic. I regularly walk in the area and the countryside is beautiful. I would be heartbroken to see our lovely landscape spoiled with more buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5945  Respondent: 15418849 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT most of all to Send being removed from the Green Belt. I thought the whole point of the Green Belt was to have a permanent protection of towns and villages around London to ensure they don’t merge into each other and to ensure sufficient green landscapes to retain our beautiful countryside. Why are Local Councillors and Central Government reneging on a promise in the election to protect our Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16751  Respondent: 15418849 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

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Comment ID: PSLPS16/2649  Respondent: 15418881 / Caitlin Davey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
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  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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**Attached documents:**

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I would like to state my objection to the building of 2,000 new homes on the Former Wisley Airfield. The A3 is already under pressure from traffic with the interchange of the M25. I live in Cobham and use the A3 nearly daily, the increase of traffic over the last few years is disproportionate to the area. Access onto the A3 from Elm Lane off the airfield is very dangerous as is Old Lane, a potential increase of over 2,000 vehicles, even through Hatch End, Martyrs Green area, would impact greatly on Cobham, which is often at a standstill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. Infrastructure issues:

There are, as the consultation documentation recognises, important infrastructure requirements if there is to be any further housing development in the Guildford area. With regard to Shalford the A281 needs relief and not more traffic joining an already congested road. If, as is widely anticipated, the Broadford brown site development in Shalford proceeds this will test the stretched infrastructure and should not be compounded by development on the fields behind the Village Hall. Chinthurst Lane is a rural lane without footways. Many residents, including children, those with pushchairs, walkers and runners are forced to use the carriageway. The traffic generated by additional houses would aggravate the current vehicle/pedestrian conflict in the lane and be at odds with its attractive semi rural character. Since land adjoining the carriageway is in part in private ownership, in part registered common land and the provision of footways would spoil the lane’s character, the absence of footways will continue to exist. The Society objects to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels - roads, doctors, schools will not be able to cope if there is development before suitable infrastructure arrangements are in hand.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5964  **Respondent:** 15419425 / Fields Behind Shalford Village Hall Pres (Charles Meade-King)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The above Society is an informal group of like minded individuals who have been working since 2009 to protect the fields behind Shalford Village Hall from development. A number of members of members of the Society are intimately familiar with the recent history of the this land and stand ready to provide any further information that would assist the Council in understanding the concerns regarding the proposals affecting these fields and ideally to help the Council to draw the appropriate conclusions.

In short, the members of the Society **strongly object** to the proposed changes to the Green Belt designation and the change to the Settlement Boundary with regard to the fields behind the Shalford Village Hall.

1. **Original intention for the fields:**

For a number of years, each time there has been a consultation on the Local Plan we and many, many others have objected strongly to the proposal to remove the Green Belt protection from this site and include it within the Shalford Settlement Boundary.

In short, but much more detail is available on request, this land was originally protected by mutual covenants including the Shalford Parish Council as a Trustee for the Village Hall. The land which includes the Village Hall was given for the benefit of the people of Shalford and the local community in 1985 and suitable covenants imposed on the surrounding land. The current owner of the fields in question would never have been able to purchase them without agreeing to the covenants.

Subsequently, the covenants were released when the Village Hall and Tennis Club wanted to expand and also build the bowling green. At the time the Parish Council was mindful of, and comforted by, the facts the fields were:
• outside the Settlement Boundary,
• part of the Green Belt, and
• designated an Area of Great Landscape Value (AGLV).

1. Lack of Clarity and Certainty in Consultation documentation:

At what appears very short notice it is now proposed to designate the fields as "Open Space (currently being updated to include assessment of villages following insetting)"; this proposal appears to arise from a report dated June 2016, hence the feeling of this all being done in a possibly ill-thought through hurry as the Local Plan consultation covering '000s of pages began on June 6". Further, Open Space is not defined in any Glossary in the consultation documentation. The import of the words in brackets creates considerable doubt as to what has been decided or is intended. Although a Surrey County Council footpath runs past the land (Shalford PFP266) there is no public access to the fields and it is not clear how the Council could utilise the land as Open Space.

Further the consultation proposes that the whole of Shalford is covered by the AGLV protection. It is understood this is an error, although this is not widely known.

It is strongly believed the arguments for changing the Settlement Boundary and removing the Green Belt protection are not justified by this opaque designation as "Open Space (currently being updated to include assessment of villages following insetting)."

The cynical would suspect it is a process to enable development, as once the Settlement Boundary is changed and the Green Belt protection removed it will be eminently possible for developers to undermine the Open Space designation, which seems to be unachievable.

It is understood developers have a contractual obligation to spend significant sums of money seeking planning permission to develop this land and the uncertainty and lack of clarity in the consultation paperwork is opening the door to them. If the Green Belt protection is removed the presumption would be in favour of housing development and the current confusion would open the door to the developers to this land.

1. Strength of local feeling against any development on these fields:

In the last consultation process in 2014 over 700 local signatories signed a petition objecting to the redesignation of the fields behind the Shalford Village Hall. This strength of feeling persists and if it isn't reflected in the volume of objections received on this occasion it should be borne in mind there is an element of consultation fatigue, again it is all at very short notice, during a holiday period, the paperwork voluminous and bewildering and as described above unclear as to what is intended and the potential consequences.

1. Previous advice sought and provided to the Council:

It is not believed anything material has changed regarding this land from the report provided to the Council in 2007 in the Landscape Assessment Study by Chris Burnett and Ass. Which concluded regarding Shalford:

• "A semi-rural landscape persists;
• Need to ensure long term protection and management of the commons, grass verges and open spaces that exist between the areas of development;
• The area is especially vulnerable and sensitive to adverse change and could very quickly change to a landscape perceived as part of a continuous urban area and extension of Guildford

Key vulnerabilities and sensitivities primarily relate to small commons, grass verges and open land that exist between developments. These 'gaps' do not all have formal protection as registered common land and are therefore vulnerable to development as well as smaller scale incremental change such as the creation of car parks and recycling facilities that create more typical urban fringe character. Today, the historic origins at the landscape can still be perceived, although
further development could obscure these references by imposing a more homogenous, ubiquitous landscape on the fragmented, piecemeal mix which creates the current character of the area.

Conserve the low key rural character of the roads and Lanes that form the boundaries as this area and avoid upgrading, widening and imposition of formal highways infrastructure. Seek to limit suburbanising elements on the urban edge (lighting, fencing etc.) that detract from the rural character of the area.

The area has similar characteristics to the neighbouring Area of Outstanding Natural Beauty."

In the Society's view nothing significant has changed and these conclusions and recommendations could almost be about the fields behind Shalford Village Hall and Chinthurst Lane.

A semi-rural aspect does still exist to the east of Chinthurst Lane and any development on the fields would inevitably require the Lane to be widened and upgraded. Is it really the case the trees bounding the Common at the King's Road end of Chinthurst Lane will be sacrificed along with the current characteristics of the area, as described above, to allow a developer to exploit the two fields behind the Village Hall? Is it really the case the trees bounding the Common at the King's Road end of Chinthurst Lane will be sacrificed along with the current characteristics of the area, as described above, to allow a developer to exploit the two fields behind the Village Hall? It is interesting that the consultation paperwork divides Shalford into a North and South. South Shalford and in particular that area south of the railway line is not urban in character and the proposed changes to the fields behind the Village Hall will jeopardise this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5972  Respondent: 15419425 / Fields Behind Shalford Village Hall Pres (Charles Meade-King) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary the Society objects to this proposal to change the Settlement Boundary and removal of Green Belt protection because:

• A slightly amended existing boundary following clearly defined boundaries would be more logical excluding this and other open land from the Settlement Removing the Green Belt protection means there will inevitably be an application pursued with vigour at length by developers. The current boundary is clear, physical, recognisable and has proved eminently defendable to date.

• The wording in the consultation is too unclear for us to consult on; there is no definition of 'Open Space' and we don't know the possible consequences of "currently being updated to include assessment of villages following insetting". Why is it proposed to change the AGLV boundary to cover all of Shalford?

• There is no logic in making the proposed changes and then designating the fields as "Open Space". If the Council wishes to avoid the inevitability of a development on this land then the best thing would be to keep the Green Belt protection, not include the fields within the Settlement Boundary and further, declare it Local Green Space and subject to Special Calling it Open Space is, as currently proposed, unclear and likely to be easily overturned by the developers.
The strongly held views of significant numbers and proportion of Shalford residents (as evidenced by the petition signed by over 700 residents in 2014) and those of the Tennis and Bowling Clubs and Village Hall Committee together with the Parish Council, which is an important voice of the local community, all object to this. The expressed view of the local community is that this land should be left undeveloped. Therefore this intention would be best met by retaining this land in the Green Belt with its additional AGLV protection and outwith the Settlement Boundary. It is understood it could still then be declared Open Space if this is possible and appropriate.

It is possible that many local residents probably think there is now no longer any threat of the land being developed and therefore do not need to write.

The history of the fields and the intention for them to be left for the benefit of the people of Shalford and the local community and the basis upon which the covenants were released.

Chinthurst Lane is not wide enough to accommodate more traffic. The Society strongly believes the Council should work to preserve the low key rural character of the roads and lanes that form the boundaries of this area and avoid upgrading, widening and imposition of formal highways, street lighting and fences which would suburbanise a rural part of the Village.

These fields contribute to the open character of this part of the village of They rise 32 feet above King's Road. Buildings of any height would change the skyline of Shalford and tower over and detract from the enjoyment of the many users of the tennis, Bowls Clubs, the Village Hall and the Common.

The Society considers that this open land is inappropriate for inserting from the Green Belt and being included within the settlement of Shalford that would have protected this AGLV land. It is possible that Council officers and members are trying to accommodate the wishes of the local community with the Open Space designation. It is however submitted that all three designations should be included in the Plan; Green Belt, AGLV and Open Space with regard to these fields which give a much better chance of them being saved from development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to a new interchange with the A3 at Burnt Common. This would send much more traffic which currently bypasses Ripley village through narrow roads, particularly Polesden Lane, which is partially single track and already a nightmare to traverse.</td>
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<td>I object to Ripley and Send being removed from the Green Belt. This area of Green Belt prevents the joining up of Guildford and Woking and is against the principles agreed by local councillors and central government to protect the Green Belt. The rash of new development being now discussed would just be the beginning.</td>
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I object to Local Plan Policy A58 because there is no need to build on Green Belt land when there is clearly industrial space available in the local area. The road and traffic situation in the area of the proposed development is already congested and the increase in HGV traffic will only cause further problems. I also object to the infilling of areas between villages via the use of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/475  Respondent: 15419489 / Janet Drew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the use of Green Belt land for this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2671  Respondent: 15419649 / Ann Dunning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor
stretches from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan’s commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send Road is already overloaded and increase in traffic from A3, M25, Woking and Guildford would become gridlocked with noise pollution levels increasing which are already very high. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7524 Respondent: 15419713 / Russell Woods Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill. Due to the subsoil of the proposed site containing documented unsafe landfill waster registered at GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16758 Respondent: 15419713 / Russell Woods Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to send village being removed from the Green Belt. It was intended to be permanent as required by the National Planning Policy Framework and it is wrong and not justified to abandon it. Without the green belt there is no buffer between Woking and Guildford to prevent it becoming one conurbation. If the Green Belt is lifted there will be nothing to stop developer building and building until our lovely villages in the area are destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as "open spaces" there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5978  Respondent: 15420353 / Victoria Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like to formally object to the removal of green belt protection from a number of villages in the Guildford area, as proposed in the Guildford Local plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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At the present time there are understood to be some 2808 houses in East and West Horsley combined and if the present Local Plan is adopted it would add 533 houses on 'large' sites and 60 houses on 'small' sites within these two villages - a 21% increase! As Horsley residents, we think it is excessive and objectionable.

This increase, moreover, should be viewed against the proposed developments within a 5 mile radius of Horsley, in particular 2000 houses on the Wisley Airfield site, 400 on Burnt Common, and 2000 at Gosden Hill Farm, making in all 4993 houses, a staggering total which will, in our opinion, completely ruin the current attractive rural character of the area.

It is thought that the inflated number of new proposed houses arises from a 'Strategic Housing Market Assessment that was generated by a consultant's mathematical model- not revealed in the Plan. That housing number has been increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough, which thus leads to alarming results.

It is not just the increase in housing which is relevant, but all the changes that come with it - for example, the increase in population and household cars, demands for school, medical practitioners and hospital places, and transport facilities,
which have to be considered against the existing positions. In the Horsleys, the local schools are full, medical facilities stretched, roads are overloaded and drainage inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/5984  Respondent: 15420417 / C Martin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In this Local Plan there is a proposal to remove the Horsleys from the 'Green Belt', but the 'exceptional circumstances' required to be present before taking this action have NOT been demonstrated. Nor have any sound reasons been given for the extension of the boundaries of the 'settlement areas' of the Horsleys, We also object to 'Station Parade' being designated a 'District Centre' which completely misrepresents the village centre, and if accepted, would thereby allow detrimental future urban development.

In our opinion, and for all the above reasons, this Local plan should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2689  Respondent: 15420449 / Stefan Wasilewski  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In common with many residents I consider there to be sufficient brownfield sites and other avenues to accommodate reasonably affordable housing than to sacrifice greenbelt land and our children's future capacity to grow food.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7555  Respondent: 15420449 / Stefan Wasilewski  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In common with many residents I consider there to be sufficient brownfield sites and other avenues to accommodate reasonably affordable housing than to sacrifice greenbelt land and our children's future capacity to grow food.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **Planned level of housing need.** I cannot see that the assumption of housing need at 693 per annum has been adequately explained / evidenced - since this is a critical assumption determining the scale of required developments I cant see how any decision to proceed with the plan can be supported.

1. **Traffic and Road infrastructure plans.** Having reviewed the transport impact analysis arising from both the Slyfield link road and the Gosden Hill housing development I have found it unconvincing.
   
   • As a result of these developments Burpham will be faced with significant traffic increases of both commercial and private vehicles which I would expect to cause major issues on a daily basis
   
   • In particular the estimate of heavy lorry traffic southbound off the A3 to Slyfield is especially concerning as it is simply too low
   
   • I have not found any convincing analysis showing the combined effect of the two developments on the traffic in the Burpham area
   
   • Of particular concern is the lack of consideration of the traffic flows having to pass through Burpham from the Gosden Hill development wanting to travel north along the A3

Until full details of the proposed road infrastructure and a full traffic analysis, detailing assumptions and their appropriateness behind the analysis, is made available I cannot see how a decision to proceed with the plan can be supported

1. **Air pollution.** I cannot see any adequate estimate of the affect of increased traffic levels on air pollution in the area. I have not been able to find any analysis of either existing levels of air pollution in and around the area and any expected impact from the developments. When looking at the stalled traffic on a daily basis currently seen morning and evening on London Road I would expect high levels of pollution already which will be exacerbated by increases in commercial and private vehicle traffic as a result of the development. Lack of such a detailed baseline analysis looking at the specific areas and critical sites (e.g. Burpham primary school) and the anticipated
impact of the development the adoption of the plan may well become subject to legal challenge leading to significant cost and delay to the councils plans.

Until a detailed baseline analysis and impact assessment focused on the specific areas where traffic is expected to increase I cannot, again, see how a decision to proceed with the plan can be supported.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5981  **Respondent:** 15420545 / SE Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At the present time there are understood to be some 2808 houses in East and West Horsley combined and if the present Local Plan is adopted it would add 533 houses on 'large' sites and 60 houses on 'small' sites within these two villages - a 21% increase! As Horsley residents, we think it is excessive and objectionable.

This increase, moreover, should be viewed against the proposed developments within a 5 mile radius of Horsley, in particular 2000 houses on the Wisley Airfield site, 400 on Burnt Common, and 2000 at Gosden Hill Farm, making in all 4993 houses, a staggering total which will, in our opinion, completely ruin the current attractive rural character of the area.

It is thought that the inflated number of new proposed houses arises from a 'Strategic Housing Market Assessment that was generated by a consultant's mathematical model- not revealed in the Plan. That housing number has been increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough, which thus leads to alarming results.

It is not just the increase in housing which is relevant, but all the changes that come with it - for example, the increase in population and household cars, demands for school, medical practitioners and hospital places, and transport facilities, which have to be considered against the existing positions. In the Horsleys, the local schools are full, medical facilities stretched, roads are overloaded and drainage inadequate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/5982  **Respondent:** 15420545 / SE Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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229
In this Local Plan there is a proposal to remove the Horsleys from the 'Green Belt', but the 'exceptional circumstances' required to be present before taking this action have NOT been demonstrated. Nor have any sound reasons been given for the extension of the boundaries of the 'settlement areas' of the Horsleys. We also object to 'Station Parade' being designated a 'District Centre' which completely misrepresents the village centre, and if accepted, would thereby allow detrimental future urban development.

In our opinion, and for all the above reasons, this Local plan should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

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Comment ID: PSLPS16/2697  Respondent: 15420673 / Kevin Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
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  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1487  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of West Clandon. I have lived on Meadowlands Estate since 1957 - nearly 60 years. West Clandon is a small village and will be squeezed in amongst the development plans detailed in the Local Plan. The road through the village is narrow in places, lorries frequently mount the pavements and there have been worrying incidents/accidents. Traffic does not adhere to the speed restrictions. It is dangerous to walk through our village, especially for my daughter pushing me in my wheelchair. The traffic is particularly heavy due to the A3, where vehicles come off at Burnt Common and through West Clandon when traffic is queued on the A3. I append my objections to the Local Plan as follows:-

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt.

If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 -2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
- 21 Oct 2015 - A247 near shell garage - Three vehicles collided causing delays Surrey Fire and Rescue

2016

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Comment ID: PSLPS16/2738  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
15 April 2016 12 year old boy injured in The Street - A247 closed in both directions
28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2739  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick's Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate.

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan.

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders.

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site.

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6000  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace.

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6001  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment.

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6021  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment"/"Di sneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require. no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London)
would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6016  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6012  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of...
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.
The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.) The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6005  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the road's serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/6006  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25.

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6011  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns.

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing "to the openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions. Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing need. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5996  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5986 **Respondent:** 15420833 / Marjorie Moss **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable.

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of **sustainable** development becomes a presumption in favour of **any** development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5992</th>
<th>Respondent: 15420833 / Marjorie Moss</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and
half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haselmere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/971  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: SQLP16/972  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: SQLP16/973  **Respondent:** 15420833 / Marjorie Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green " Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councilors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
6. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.
7. Much of the infrastructure required to support the level of development proposed is outside the Council's The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
16. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18
17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

1. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

2. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

3. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

5. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

6. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council very little.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/974  Respondent: 15420833 / Marjorie Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2701  Respondent: 15420865 / Thomas Jimmison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPA16/1484</th>
<th>Respondent: 15420961 / S M Newton</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Local Plan 2016

I object to the new plans seeing that all the proposed building is on GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/4059</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Local Plan 2016

I object to the new plans seeing that all the proposed building is on GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

There doesn’t seem to be a plan to address congestion, especially in the centre and the RSCH/research park area. Until there is, the local plan is not ready to be inspected.

A3 through traffic needs additional lanes and separation from local traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<th>Comment ID: PSLPP16/6008</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I despair at the lack of vision in exploring innovative solutions. Over 30 years of almost total inaction with the sole exception of P&R. There are so many things that could be done:

- integration of bus and rail services is essential

- rapid transport solutions of various kinds linking P&R, the centre, the main station, the hospital and research park etc, perhaps comprising an expanded train service with new stations plus trams or even buses running on raised tracks above the narrow main road arteries coupled with a dramatic reduction in public car parks (disabled only?) to ensure new public transport services are fully used and thereby have a chance of being economic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/16828</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to the many proposals to use the green belt. It’s such a slippery slope. Allowing this amount of development is bound to set a precedent leading to further erosion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/6010</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Growth in housing is out of proportion with natural growth

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Guildford has been a desirable place to live and residents are entitled to want to keep it that way. Organic growth is natural and expected, but an increase of about a third in the population in a short time will almost certainly have a strong negative impact on the character of Guildford. Please think again.</td>
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<th>Respondent: 15421281 / Michael Wilson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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<td>We object to Guildford Borough Council's draft Local Plan proposals 10 build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:</td>
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<tr>
<td>• destroy views from the Hog's Back ridge – a nationally designated Area of Outstanding Natural Beauty</td>
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<td>• remove 72 hectares of scenic farmland and additional ancient woodland from the green bell</td>
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<th>Respondent: 15421313 / Eric Miliam</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live outside the Borough I am, and have been for many years, the tenant farmer at Bridge End Farm in the Borough. I visit every day the Former Wisley Airfield and the surrounding areas. I am disappointed that my previous objections to the draft local plan have not been reflected in the latest draft.

I OBJECT to the draft Submission Local Plan for many reasons, particularly the following:

- I object to the proposal to allocate so much new housing to the Green Belt; it should be put on the brownfield land in the urban areas of the
- I object to the housing number of 693 houses per year; this number appears to me to be far too high, particularly in the context of Brexit
- I object to the proposal to remove the Former Wisley Airfield (FWA) from the Green Belt. This area clearly fulfils an important objective of separating Ripley, Cobham, Woking and Horsley.
- I object that this urban 2,000-house development would be totally out of place in the rural environment of Ockham.
- I object to the danger from its effects on transport, local roads and road safety. The proposed remote development of 2,000 homes would result in around 4,000 additional cars on the roads, with residents having to drive to work and drive children to school. I am obliged to drive my large tractors on the narrow local roads in Ockham and the surrounding area as well as on the A3. More cars would increase congestion on the local roads and the A3. Cycling would be dangerous.
- I object to the threatened loss of high quality farmland, including 4ha classified as Best and Most Versatile land where crops have been grown for decades and probably for centuries.
- I object to the continued inclusion of this site where the Planning Committee has already unanimously rejected a recent planning application.

I request that the Former Wisley Airfield, site A35, is removed from the Submission Local Plan and the land kept as Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge – a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I'm v. concerned about the proposal to build

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/721  Respondent: 15421441 / William Lintott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2723  Respondent: 15421505 / Marketa Studnickova  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live in Surbiton I drive every week to visit friends in the Borough

I OBJECT to the draft Submission Local Plan for the following reasons:

- I object to the proposal to take so much land out of the Green Belt; new housing should be put on the brownfield land in the urban areas of the
• I object to the proposed number of houses; it seems too
• I object to the proposal to remove the Former Wisley Airfield from the Green Belt; it separates Ripley from
• I object to the urban 2,000 house development being placed in the historic rural village of 159 homes in
• I object to more development which would have an impact on transport, local roads and road. The narrow rural roads in Ockham and the surrounding area cannot cope with the extra traffic, which would increase the already severe congestion on the A3.
• I object to the continued inclusion of this site A35 where a recent planning application has already been unanimously rejected by the Planning

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/2721    Respondent:  15421537 / Jane Brazil  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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• increase tailbacks on the A31 and traffic congestion
• result in rat-running through local roads
• add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/198    Respondent:  15421537 / Jane Brazil  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2722  Respondent: 15421569 / Richard Ker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7577  Respondent: 15421633 / Julia Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal for building 45 houses at Clockbarn. It feels as if comments made by residents of Send are simply ignored from one planning proposal to the next. I sat through the planning meeting where planning permission was granted for a marina on Tannery Lane. Even though the problems of vehicle access along Tannery lane and at its exits – a narrow windy lane with stretches of single passing, with an extremely narrow and windy residential stretch, if traffic continues onto Papercourt Lane, and a tricky junction onto the A247 in Send where visibility to turn out onto the main road is very tricky and hazardous – were raised by many, those who voted to grant permission in no way addressed those issues – the permission to develop the Green belt seemed to be granted on the basis that there were ‘special circumstances’ thereby making it acceptable. The requirements attached to the permission for the marina only appear to address the issues of a pathway through to Wharf Lane and the widening of a 200m stretch towards Send Road. This will not be adequate to eradicate traffic problems from this development and will certainly not support further development. I have never understood what the special circumstances are that would justify introducing hazardous traffic levels to our area and there was the additional concern, at the time, that granting of this permission would lead to further applications in this area, Tannery Lane cannot take any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2728  Respondent: 15421633 / Julia Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan and there are plenty of examples of unused existing floor space that should be utilised before provision of more. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available. The additional traffic that would be brought to the area by an industrial area will not be able to be serviced by the road infrastructure and the proposal for the new interchange will in no way help.

The Garlick’s Arch site also has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding. Economic growth in the Guildford area should not require the loss of our rural heritage or be targeted at an area that cannot cope with it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2730  Respondent: 15421633 / Julia Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common. I believe it would be disastrous for Send. The Transport Evidence is incomplete and unreliable but, even so, shows there will be congestion because Send would be used as a cut through to the A3/M25. The A247 already suffers from over loading so any additional traffic would be disastrous and we may well have a situation where we are gridlocked regularly through the day. Traffic tail backs are already easily triggered either towards Old Woking or through Send to Burnt Common - any additional traffic to and from the A3 would result in these queues stretching in both directions through the length of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2732</th>
<th>Respondent: 15421633 / Julia Cogan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the development of 40 houses and 2 Travellers Pitches at Send Hill. Again, this is an area which has already come under planning proposals and residents have already spent time trying to explain the problems. Not only would this spoil a beautiful area of Green Belt but it is unsuitable for development for many reasons. It has no suitable vehicle access as Send Hill is a narrow residential lane which cannot support further traffic and has poor junctions at both ends. The junction with the A247 only copes on the basis that traffic from and to Send Hill is light. At both ends of the school day, when traffic is higher, I would divert down Potters Lane and along Send Rd rather than try to use the junction of Send Hill and the A247. It is impossible to pass and extremely dangerous for the children arriving and leaving school. If it is that bad already, how could we support more? Additionally, the other end of Send Hill, where it joins Potters Lane is already extremely hazardous. It is a single passing bending section, accessing onto a bend of Potters Lane, with very limited visibility. My daughter’s driving instructor advised her to stop at the junction of Send Hill and Potters Lane and wind down the window, whatever the weather, so that she has some chance of hearing whether there is any traffic approaching from either direction of Potters Lane as it is impossible to see traffic coming. This junction cannot support higher levels of traffic.

In addition, development here would be sighted on an area where the subsoil has previously been documented as containing unsafe land fill waste. The local plan is flawed in its reference to this area as it describes it as a quarry whereas it was a landfill site “refuse tip” prior to a time when proper licensing/registration was required and predating the 1999 EU Landfill Directive regulations. GBC has recognised this problem, stated it has “areas of potentially contaminative industrial activities”, installed gas monitoring wells and recorded methane gas discharge. I therefore believe that there is a danger that any disturbance would be a health hazard. The area is also vulnerable to flooding. A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area, the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 identified that changes to the proposed site could cause potential ground water vulnerability to properties and you only need to walk in the area to see how susceptible it is. Further development would disturb the water table and increase risk of flooding in the area. The recent death of a child as a result of seepage of contaminated ground following flooding prove that developing any such sites is a danger to health in addition to the problems of flooding.

It would be totally unacceptable to offer such an area for a Travellers’ pitch. The Travellers would also be being located in an area where other elements of the infrastructure, such as schools, doctors (it is already almost impossible to get a doctor’s appointment in an acceptable time scale, we have resorted on many occasions to the walk-in centre in Woking) and other services, would not support their needs.
My additional objection to this proposal lies in the fact that the Traveller Accommodation Assessment research does not seem genuine as the research is dated June-July 2012, by Mill Field Services, but this market research company was dissolved in January 2011 according to the government companies’ site.

I also feel very strongly that this is an area of nature reserve nearby. I object on these grounds as we shouldn’t be endangering such areas, especially when there is no justification for the development. Unfortunately such considerations do not seem to carry the importance that they should but, alongside all the other reasons, they should add any necessary further weight to the objection.

I do feel that I cannot express sufficiently strongly how I feel about this new plan and the objections to it. If it remains in its current form, it will be looked on with regret, as the moment when this area of our beautiful country, which we thought we had saved by the imposition of the Green Belt, was irrevocably destroyed for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16830  Respondent: 15421633 / Julia Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt was implemented for a very important reason – up to now it has been hugely valuable in saving our countryside – I do feel we owe it to future generations to do all we can to preserve the beauty of our country and not have them look back with regret that the green belt was not maintained, when the urban sprawl from London extends outwards engulfing Guildford and Woking and, with no imposed buffer, having no restriction to its spread. The whole point of the Green Belt was to stop such a disaster. How, therefore, can either destroying the Green Belt by huge areas of development or removing sections of the Green Belt be even considered when, despite various claims, there is no actual need?

I object to the clear contravention of the government’s commitment for Green Belt protection and the proposals for insetting of the Green Belt which can only open the doors for unscrupulous developers. The Government’s pre-election commitment to protect our Green Belt should be upheld by GBC. I completely understand that the government has set huge targets for housebuilding but we must not give up the green belt for these targets – it is possible to meet these targets without – we must not be influenced by the wishes of developers either wanting to avoid the costs of reclamtion of brownfield sites or wanting to take advantage of premium areas to build houses that will command higher value. In any case, the latter are not the housing need and destroying our green belt is not the answer.

The Local plan proposals to build on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill, and elsewhere in the borough are not justified when we can use urban brownfield areas of Guildford which are already better served by infrastructure. Such building is not justified by any special circumstances and therefore doesn’t justify erosion of the Green Belt. I object to the fact that GBC have failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt, and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object that we are given an exaggerated “housing need” figure of 13,860 and that 70% is targeted at the Green Belt – the housing need figure has been wrongly calculated and wrongly apportioned to our area and, also, the housing need for students wrongly assessed – we must not use our Green Belt, but use our urban land better, finding better ways to provide affordable housing and for additional student accommodation we should concentrate on existing areas of the University of Surrey’s campuses where there is much unused land and large areas of surface parking.

I object to the housing numbers that are proposed in our locality (including the 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm) - they are not only far too large for an area that does not have sufficient infrastructure but they will totally destroy the Green belt and large areas of agricultural land. These enormous areas of development will completely change the nature of the environment over a huge area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I also object to the fact that proposed sites in Send, including the Garlick’s Arch proposal, have been added as a last minute addition. They were not included in the 2014 consultation, Send has not been properly consulted and other proposed sites have been substantially changed. The development at Garlick’s Arch for 400 houses was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live in New Malden I drive regularly to visit friends and take my daughter to where she keeps her horse in the Borough.

I OBJECT to the Proposed Submission Local Plan and the inclusion in the Plan as a potential site for development of the Former Wisley Airfield for the following reasons:

1. I object to the proposal to take so much land out of the Green Belt which should be preserved for future generations; new housing should be put on the brownfield land in the urban areas of the
2. I object to the housing number of 693 every year; it is too high. I object that the public has not been told any details of how this figure was determined. It should be reviewed independently, additionally to reflect the impact of Brexit which is likely to reduce the number of foreign students wanting to come to this country.
3. I object to the proposal to remove the Former Wisley Airfield from the Green Belt; it separates Ripley from
4. I object to the urban 2,000 house development being placed in the historic rural village of 159 homes in
5. I object to more development which would have an impact on transport, local roads and road safety. The narrow rural roads in Ockham and the surrounding area cannot cope with the extra traffic, which would increase the already severe congestion on the
6. I object to the proposal that encourages many more cars causing further deterioration in air quality when the A3 and M25 are already in breach of regulations; the acid deposition on the nearby SPA is also in breach of
7. I object to the continued inclusion of this site A35 where a recent planning application has already been unanimously rejected by the Planning Committee.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2737  **Respondent:** 15421793 / Alan Pezaro  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Objections to the draft local plan

I object to the development at Wisley on the grounds that the development is huge (higher than an urban one) resulting in vast numbers of additional cars which the roads are completely unable to cope with.

I support the objection made by the parish councils of Ripley, the Horsleys, Ockham on the grounds that the government (and local councillors) pledged to protect the green belt.

I object to the Local Plan as it would encourage Urban sprawl linking the villages eventually with Woking.

I object to the development on Long Reach. It is not a "suitable alternative" although it definitely is a "Natural Greenspace" and as such any development would wreck the countryside which separates the villages of Ripley, the Horsleys and Ockham.

I sometimes wonder if the planners who come up with this local plan actually travel on local roads or do they simply look at a map and see a road.

The roads in this area (Ripley/ Send/ Horsleys/ Ockham/ Pyrford) are COMPLETELY UNSUITED to a huge increase in traffic and the whole area (THE COUNTRYSIDE) does not deserve the added pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1494  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. I OBJECT to the proposed Infrastructure Schedule

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4064   Respondent: 15422145 / Orlando Lee   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1495   Respondent: 15422145 / Orlando Lee   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high

   ° The “objectively assessed need” figure of 693 homes a year is too high.

   ° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked, making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/4063</th>
<th>Respondent: 15422145 / Orlando Lee</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2740  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7585  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPS16/2741  Respondent: 15422145 / Orlando Lee  Agent:
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7586  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPS16/7587  | Respondent: | 15422145 / Orlando Lee  | Agent: |
|-------------|----------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Attached documents:**

| Comment ID: | PSLPP16/6045  | Respondent: | 15422145 / Orlando Lee  | Agent: |
|-------------|----------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16851  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6042  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the sustainable employment policy

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16848  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6043  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I OBJECT** to the location for new employment floorspace at Garlick’s Arch – Site A43

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/16849  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I **OBJECT** to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/6044  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. I OBJECT to the loss of rural employment

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16850  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6051  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.
Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16856  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6049  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16854  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6050  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16855  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6046  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6047  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the lack of proper infrastructure planning for sites

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16852  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16844  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6048  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to poor air quality concerns

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16853  
Respondent: 15422145 / Orlando Lee  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6034  
Respondent: 15422145 / Orlando Lee  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.
There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to not protecting the Green Belt (Policy P2)

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<tr>
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1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16847  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6040  Respondent: 15422145 / Orlando Lee  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to the Borough Wide Strategy (Policy S2)
2.  The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3.  The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16846  **Respondent:** 15422145 / Orlando Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared
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The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6039  **Respondent:** 15422401 / N Millete  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have received your letter of 2nd June concerning the local plan, now revised, and as with previous correspondence I wish to object to the bases of the proposals, and I would refer you to my letter 26th January 2016 which sets out my objection in some detail. I do not propose to re-raise the reasons for my objections, as age finds this difficult for me, but I suppose my major concern is in respect of the preservation of the green belt which the proposed plan does not respect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1496  **Respondent:** 15422465 / Lynn O'Rourke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GBC have failed to provide sound evidence regarding the employment land needs assessment 2015 (ELNA) it is my opinion that the land requirements have been over stated on the basis of questionable information.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1497  **Respondent:** 15422465 / Lynn O'Rourke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY P2 Send**

**POLICY A43, 30ha Land of Garlick's Arch**

**POLICY A44, 1.9 ha Lands West of winds ridge and Send Hill**

It is my opinion that the Ripley / Send areas are NOT in need of further development. Furthermore these areas are of borderline flood risk areas (there is a clue in the road name "Send Marsh Road" and so I believe that these areas must stay within the green belt area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6052  **Respondent:** 15422465 / Lynn O'Rourke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I write to strongly object to the following issues,

I believe that it is self-evident that GBC have not followed the correct planning processes and have not truly taken into consideration the impact these developments will have on our surrounding areas, for instance we already suffer from massive traffic congestion at rush hours and in times of overflow from the A3 road. To further develop our surrounding areas will have a massive impact on traffic and our environment not to mention social needs and services. There are no exceptional circumstances at all to justify these plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1503  **Respondent:** 15422529 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2748  Respondent: 15422529 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016
• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2749  Respondent: 15422529 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/6060</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6071  Respondent: 15422529 / David Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6057  Respondent: 15422529 / David Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6074</th>
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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6069  
**Respondent:** 15422529 / David Roberts  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6066  **Respondent:** 15422529 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**1. POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6067  **Respondent:** 15422529 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6073  **Respondent:** 15422529 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e., normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6063  Respondent: 15422529 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6064   Respondent: 15422529 / David Roberts   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6055   Respondent: 15422529 / David Roberts   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6075  Respondent: 15422529 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6054  Respondent: 15422529 / David Roberts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and...
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/4065  **Respondent:** 15422625 / Graham Burrows  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence for the alleged housing need numbers

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/7588  **Respondent:** 15422625 / Graham Burrows  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 400 new proposed homes at Garlic Arch, with new roads belching out onto an already busy roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7590  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to The Talbot, which is an over development in a conservation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7589  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the A57, The Paddocks - this is unlawful

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6072  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of immediate provision of Doctor Surgeries. There is already long delays for appointments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16860  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of immediate provision of new schools
- I object to the development adding more traffic to an already very busy road, with traffic using the area as cut through from other over populated areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16857  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of all green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16858  Respondent: 15422625 / Graham Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the removal of any villages within the Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1855</th>
<th>Respondent: 15422625 / Graham Burrows</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1504</th>
<th>Respondent: 15422689 / Felicity Thorpe</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I object to insufficient consultation period, of 6 weeks to review a 1800 document

I object to the last minute inclusion of new sites with less than two weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The 4 policies (A42/A43/A43a and A44) are totally unacceptable for the village and there are far more suitable places for development, especially within Guildford and therefore I suggest GBC considers alternative sites. Send cannot cope with the level of development proposed and any development will have a detrimental effect on the local community and environment.

Please can I request that my comments are shown to the Planning Inspector who will decide on the proposed developments in Send and the surrounding area. Please can you also confirm receipt of my letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2751  Respondent: 15422689 / Felicity Thorpe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Additional housing (A43) at Garlick's Arch will exasperate and add to the local chaos on the roads and the already stretched amenities. I therefore strongly object to building 400 Houses and 7000 sq metres of industrial space at Garlick's Arch. The site floods and is covered by ancient woodland. The industrial is not needed as there are many offices and warehouses sitting idle in the local area. Fill these sites first before developing more empty units. Any new industrial units should be built at Slyfield where there is already an established site and the roads can cope with the traffic. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

In addition to the other proposals, I object to Policy A42, 45 houses proposed to be built in Clockbarn Nursery, Tannery Lane. Tannery Lane is a country, single access and the staggered cross roads-junction with Send Road is already dangerous, especially due peak times. This will just add to the growing congestion in Send. Planning permission has previously been given for 64 apartments at the Tannery and for building the marina, both of which will generate additional traffic (large vehicles for boats etc) The lane cannot cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2750  Respondent: 15422689 / Felicity Thorpe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Policy A43/A43a - I strongly object to a new interchange with the A3 at Burnt Common as this would generate a huge volume of traffic through the village. It is already congested during rush hours especially with the school on Send Barnes Road. When the northbound lanes of the A3 are congested both in the morning and evening rush hours (which is most weekdays) Send Village is totally congested and then many local drivers speed down country lanes (Potters lane) to avoid Send Road/Send Barnes Road and drive dangerously. Additional traffic will only exaggerate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A44 – I strongly object to the development of 40 houses and 2 travellers' pitches at Send Hill. The narrow country lane (Send Hill) would not cope with any additional traffic. It is narrow and already busy with traffic to the cemetery (which has recently been extended). The junction at the bottom of Send Hill with Potters Lane is very dangerous due to speeding traffic off of the A3. Any more traffic would make it even more hazardous. It is an inappropriate location for 40 houses because the road is narrow and single access. Also the soil of the proposed site contains documented unsafe landfill waste registered by GBC. The land is totally unsuitable for dwellings and traveller pitches. I believe the unsafe landfill will be harmful to health of any home owners. Any development there would spoil a high amenity area set in beautiful countryside. The area is used for recreational activities such as walking and would be greatly missed by locals.

Send will not be able to cope with the proposed developments. St Bedes C/E School will shortly be demolished. Currently a new school is being built in the grounds of Send First School. The new infant/middle school when complete will not be able to cope with a large influx of children. There does not seem to be any long term planning in line with GBC proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With regard to proposed development in and around Send, I wish to object to the following proposed plans:-

I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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With regard to proposed development in and around Send, I wish to object to the following proposed plans:-

I strongly object to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the national Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them. There is plenty of brownfield land still available for developing in the Surrey area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2757  Respondent: 15422785 / Andrea Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The draft local plan for Normandy and Flexford which has yet to be approved by the GBC Executive will involve building on green belt land. I had understood that this area was a strategic site (Site 368) and described as safeguarded in GBC’s 2014 local plan. I don’t believe that there are exceptional circumstances requiring it’s removal.

I would like to register my objection to the local plan as I believe it is indefensible to build on this green belt land because:

- there is no evidence for the need for a school. Surrey’s secondary schools are expanding and Ash Manor and King’s College are undersubscribed. Building in this way in Normandy does not follow a ‘sensitivity’ approach to the green belt and justifying the plan by saying there is a need for a school incorrect.
- the traffic congestion that would follow such a development would be unsustainable. There are already unmanageable traffic problems during rush hour and this plan would compound the problem.
- 100% increase in the number of homes in Normandy would destroy the rural environment. I often hear cuckoos, deer live in the local forested areas, we have protected newts, rare orchids and so on. Lifestyles in this semi-rural area will be completely changed and the beauty of the local area devastated.
- we are close to Surrey Hills AONB and the plan would remove our panoramic views and green fields.
- brown field sites should be built on first. There are many other areas around Guildford which could be considered to be more suitable for development such as Epsom Road, West Horsley. Normandy and Flexford is not surrounded by existing development, on a strategic highway route, it is not low quality green belt land or visually self-contained. This development proposal does not protect the highest quality green belt and countryside.
- the plan breaks election promises not to build on green sites and to make sure that planning decisions are made by local people. This plan was devised without the knowledge of or consultation with local people.
- sustainability and sensitivity scores have been skewed. Treating Normandy and Flexford as one settlement for the purposes of sustainability and separately for sensitivity, results in maximized and minimized scores respectively has rigged the statistics.
Please note also that Natural England is there to protect our countryside and therefore the THBSPA. Normandy is within the 5 mile protection zone and 1.5km away from the proposal. I'll be contacting them with my concerns over the future of our Special Protection Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2761  
Respondent: 15422817 / B Collins  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

• destroy views from the Hog's Back ridge – a nationally designated Area of Outstanding Natural Beauty
• remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• increase tailbacks on the A31 and traffic congestion
• result in rat-running through local roads
• add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1508  
Respondent: 15422849 / Ryan Clarke and Lauren Emberson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **I object to the figure of 693 houses per annum in the borough being too high (Appendix D)**

   The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. **I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)**

   Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

   The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

   The site is not appropriate because:
   - There is no sustainable transport infrastructure.
   - The site is liable to frequent flooding
   - It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
   - There are no plans to improve local schools, medical or utilities to cope.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2765  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
   North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of "through" traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6092  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
   The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6097  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. **I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)**
   There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning. Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. **I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**
   In our short time here, we have already noted there is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no apparent plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity. There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/6100  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/6095  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **I object to poor air quality concerns (Policy I3)**

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/6085  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I and my partner Lauren are new residents to Ripley and indeed Guildford Borough. Since moving to the area only a few weeks ago, the Guildford Borough Proposed Submission Local Plan (June 2016) has come to attention and we could not help but submit our strong objection to this plan. It either an ill thought out plan or one that prioritises private enterprise over your residents livelihood and that local environment.

We have set out our objections below.

1. **I object to not protecting the Green Belt (Policy P2)**
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6089  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to development in areas which are at risk of flooding (Policy P4)**
   The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6086  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

352
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)
   13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6091  Respondent: 15422849 / Ryan Clarke and Lauren Emberson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)
   GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2764  Respondent: 15422977 / Roxy Coles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park, and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge – a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2767  Respondent: 15423009 / Clive Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/636  Respondent: 15423009 / Clive Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2768  Respondent: 15423041 / Pam Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7597  Respondent: 15423073 / Joanna McNamara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Fourthly, I object to building 45 houses at Clockbarn Nursery. Tannery Lane is a narrow and twisty lane which at times can be hazardous. Building more houses down here will increase the chance of accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7596  Respondent: 15423073 / Joanna McNamara  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Secondly, I object to a new interchange with the A3 at Burnt Common. I assume this has been included to appease objectors to the proposed developments at Wisley Airfield, Gosden Hill and Blackwell Farm. As someone who lives directly by this new interchange I’d like to tell you what the traffic is like presently. I can not turn right out of my drive during rush hour due to the amount of traffic and lack of visibility. This requires me to turn left and then go around the Burnt Common roundabout before I can properly start my journey. The footpath stops on one side of the road and then continues on the other side exactly where you plan to put in a slip road. It is dangerous enough crossing here without any additional traffic. My other concern regarding this interchange is about how many people will then use the smaller country
roads to access the new junction. These are not built to handle excessive traffic. The noise levels and pollution along the Clandon Road are already high and this will only get worse. Think about the health of residents and recent studies which suggest high levels of pollution cause one in three strokes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/7598 | Respondent: | 15423073 / Joanna McNamara | Agent: |
|-------------|---------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lastly, I object to the development of 40 houses and 2 travellers' pitches at Send Hill. This site is located down a narrow single width road. Additional traffic and caravans should not be encouraged to travel down it. The site also has unsafe landfill waste in the subsoil as registered with Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/16864 | Respondent: | 15423073 / Joanna McNamara | Agent: |
|-------------|---------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, I object to Send Village being removed from the Green Belt. The Green Belt is here for a reason - to stop unlimited development and protect the rural areas surrounding Woking and Guildford from being swallowed up and becoming one large urban area. What reason is there to abandon it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/2769 | Respondent: | 15423105 / Susan Whitney | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2775  Respondent: 15423137 / Susan Balsdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2776  Respondent: 15423169 / W.F. Sennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I do not live in the Guildford Borough, I live much closer to the above undesirable proposed development than many others who do.

I particularly object to the Wisley site being removed from the Green Belt. This would run counter to the whole purpose of the Green Belt in preventing urban development which could ultimately see Guildford subsumed into the mass of London - there are no special circumstances that would justify this. I object also to the proposed increase in housing in Ockham, Ripley, the Horsleys and Effingham for the same reason and also because this would change the whole character of the area very much for the worse.

There would be many other harmful side effects but particularly the impact on local roads, especially the A3, and services of the increase in population. Congestion is already quite severe and the regular presence of a further 4,000 (at least) cars plus service vehicles could lead to gridlock in a number of places and there would be a serious deterioration in air quality.

Little consideration seems to have been given to the environmental and ecological value of the site and the surrounding area.

There is plenty of brownfield land that could be developed without the need to threaten the Green Belt and I hope that the council will reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16865</th>
<th>Respondent: 15423201 / Alex Bailey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
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</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

School facilities

I object to the plan on the grounds of the impact to local schools, which are already at capacity and with an extensive waiting list. There are no extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.

Traffic & parking

I object to the plan on the grounds of the additional vehicles and impact this will have on local parking and local roads. Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the Horsley villages. Parking at the, already full, stations, local shops and amenities will all be seriously affected.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16867  Respondent: 15423201 / Alex Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pollution

I object to the plan on the grounds of the increased pollution it will cause. The large increase in volume of traffic will cause an increase in air pollution, an issue that is already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16866  Respondent: 15423201 / Alex Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of green belt land

I object to the plan on the grounds of the loss to green belt land. The Mayor of London has instructed London planners not to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16868  Respondent: 15423201 / Alex Bailey  Agent:
Flooding

I object to the plan on the grounds of the potential increased flooding it will cause. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only make the problem worse. Heavy rain already causes flooding on local roads, where the drains cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1857  Respondent: 15423201 / Alex Bailey  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Road network

I object to the plan on the grounds of the impact to the local road network, which I do not believe has been adequately addressed. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burmstcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1582  Respondent: 15423329 / Jane McCarthy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Ripley I write to object 'most' strongly' regarding The Government's and Guildford Borough Council's intention to destroy this area, with their radical plans to build 14,000 homes, Residential Industrial Units and various new roads, all within this Idyllic Green Belt Area'.

May I remind you, that in the Last General Election, The Conservatives had an Election Mandate to 'save our Green Belt' What a farce! Considering your latest, proposals, whereby Fifteen Local Villages are in line to be removed from the Green Belt. To be replaced by suburbia and Urban Sprawl! It is outrageous and totally 'disproportionate' for one, beautiful area of the country and the county, to be considered for such a massive overdevelopment! It doesn't make sense. It is proposed that 'Fifteen Local Villages' be removed from the the Green Belt. It all sounds far too 'expedient' in that G.B.C can claim very conveniently that the local plan only represents a loss of 2% of Local Greenbelt - Whereas, the reality is , it is a massive destruction of a huge area of 'Fifteen Villages', thousands of peoples lives as they had planned them, their futures, all their aspirations, their love of their rural pursuits, all wiped out in one fell swoop! Or should I say Goodbye countryside and Hello Suburbia and Urban Sprawl! Hello Environmental pollution!

I object to the 2016 draft local plan.
I object to all erosion of the Green Belt.
I object to any in-setting (i.e removal) of any villages from the Green Belt.
I object to the disproportionate amount of development in one area of the Borough.
I object to the Limited Consultation Period.
I object to the last minute inclusion of new sites with less than two weeks notice.
I object to the lack of any evidence for the alleged housing need numbers.
I object to the lack of immediate provision for new schools.
I object to the lack of immediate of immediate provision for new schools.
I object to the lack of immediate provision for doctors surgeries.
I object to all the extra pollution of the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned.

It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1519  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects

- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability, and-
  - flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld from scrutiny and therefore cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is more than double the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill currently does exactly what the Greenbelt was designed to. It provides a green buffer between the Guildford Urban Area and West Clandon and other villages and gives Burpham a defined green boundary and breathing space.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. These are all requirements of the NPPF.

The scale of the Gosden Hill development is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

While no connection is currently shown between Gosden Hill and A247 (save an already overloaded A3) the developer will almost certainly seek to introduce such a connection and bring major new traffic into the village and the problematic A247.

Gosden Hill is the most obvious location for the north end of an aspirational A3 tunnel to bypass Guildford. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will add to the burden on to the A3 which is already stationary every day during rush hours. The linking of the A3100 through Burpham, B2215 through Ripley and A247 through West Clandon would channel thousands of cars, delivery vehicles and construction vehicles through the narrow, winding (A247) road through West Clandon. This is already a road where large lorries mount the pavement virtually every day.

The enhanced volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Without major as yet unplanned modifications, the existing two way north facing junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. There is no south facing slip and traffic would need pass through Merrow and Ladymead to access the A3 / A31 southbound. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a major infrastructure development.

A proposed railway station was previously rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. This has not changed but we are more dependent than ever on motor cars to access the station.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are all developed, the north of Guildford will deliver 36% of demand, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

Development and improvement of the A3 is not even slated to start until after 2020. The building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill and may have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6131  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6132  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6126  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy.

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small.

Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site, which is in the Green Belt, should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small.

Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site, which is in the Green Belt, should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses which have been in existence for over 30 years, and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6189  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment / "Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and from overseas.

2. The most valuable forms of tourism, such as walking and cycling, require no new In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

3. To enhance and promote Guildford's river landscape and to seed-corn town-break packages for high-value touri To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6151  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area to suit the aspirations of town dwellers. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students. This would free up family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, up to 2,000 homes would be freed up in town.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6188  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6135  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure. The proposed development under the plan will cause greater congestion in and around our villages. Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The A247 through West Clandon is a real issue of concern as an "A" road with inadequate width, inadequate lighting and inadequate speed control.

Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. There are no proper cycle lanes on the narrow local roads surrounding the villages and with greater vehicle traffic being generated from the proposed developments there is a real danger that there will be an increase in road accidents involving cyclists directly as a result of the development proposed under the local plan.

The Plan does not provide an achievable strategy for improving capacity on these local roads. To wilfully add traffic load would be quite irresponsible.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street (A247) generally only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements as has happened most recently on 12th July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6136  Respondent: 15424865 / Robert Victor Ewen  Agent:
I OBJECT to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways. Without proper planning and funding for healthcare and other facilities, local services will be overwhelmed.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no consideration of provision of the increased capacity of Guildford hospital.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6139  **Respondent:** 15424865 / Robert Victor Ewen  **Agent:**

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity and even standstill during peak hours and any development prior to improvement of these roads will exacerbate the situation further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states: "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to further highways congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute as traffic spills onto roads in built up residential areas and will lead to greater levels of air pollution, which in turn will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6121  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I OBJECT to not protecting the Green Belt.

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance') justifying the land to be taken from the Green Belt. Once taken, the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The high relative amount of development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced to help the Council apply the exceptions test (as described in the NPPG) as necessary to permit development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. This area often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
villages are forever reducing as they become commercially non-viable. Residents will be reliant on motor vehicles for almost all leisure, shopping and commuting journeys. These sites are unsuitable due to being unable to access sustainable public transport. Furthermore, there are no plans to improve the transportation infrastructure for Garlick's Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further traffic loading will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6120  Respondent: 15424865 / Robert Victor Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 OBJECT to the Borough Wide Strategy.

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to moderate the overall housing figure, as would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including mi These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half of those who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is also outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014, but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted within the Plan is also out of balance. There is disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new
housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are proposed between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a huge impact on the surrounding local villages and will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
see the first steps of destroying valuable greenbelt land in this area. This scheme would be more suited to the brownfield site sat and around Guildford/Woking where it can easily combine with the town centre facilities, especially with regards to water and sewage treatment.

Traffic, especially heavy goods vehicles, has increased rapidly over the past 10 years and this will continue when the development goes ahead. These are small country lanes with no traffic flow management, the road traffic accident will have to go up.

Public transport is limited in this area with no bus routes and only 2 Railway Stations at Horsely/Effingham Junction. Station car parking at both of these stations is now at full capacity, also morning peak rush hour services on the trains are also heavily congested.

These 2 proposed Roundabouts located near Old lane will make traffic more heavily congested and will deteriorate the quality of life for the residents near to them. Also the Constant noise and inconvenience to the residents during and afterwards the installation of the Roundabouts.

Very little thought and planning for the nearby residents who will have to tolerate the increased noise and pollution (noise and air pollution) that the construction this housing scheme will bring forever to this place in rural Surrey.

These are my objections to this proposed scheme and please put them on the record.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/984</th>
<th>Respondent: 15425025 / Cornelius Johann Jeronimus</th>
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<td>No evidence is given how to integrate a large influx of new houses and residents within the local village area. Within the available infrastructure road/rail/parking/school capacities are insufficient also part of our Ockham road North/South road spaces are too narrow for the safe passage of trucks/busses also the arch of the railway bridge is too narrow to allow 2 large trucks to pass at the same time. Furthermore it will knock out a large part of our green belt spaces.</td>
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<th>Comment ID: PSLPA16/1512</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix II: Maps - East Clandon</td>
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<td>I feel we are sufficiently represented by our parish council</td>
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2. We object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
We object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. We note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

4. Further, on the erosion of Green Belt and we object that Policy P2 is not met where it states that Green Belt should be protected. We object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
9. We object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

5. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

We specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated in housing twinned with large increase in cars and travel.

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) we object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will
developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on
commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land
into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/6152  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the Guildford 2016 Local Plan

East Clandon Parish Council objects to the 2016 Draft Local Plan as a whole and in particular we object to the specific
issues (listed below). We believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity
currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West
Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in
and out of the Surrey Hills AONB.

Our specific points are:

1. We object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new
homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing
numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon
and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development
plan which in itself has had no consultation with us and this combined with estimated demand from London
residents will turn Guildford into a dormitory town for London.

Further, we object to the fact that no real economic or housing demand factors have been provided by the borough
planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct
contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/990  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. We object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

We demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/303  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In policies SRN9 and SRN10 we note the change in responsibility for delivering new A3 slip roads at Burntcommon from Surrey County Council to either Highways England or developer. We have concerns that if delivered by Highways England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

We also have concerns over the changes in funding in policies SRN2 and SRN3. While we strongly welcome developer ‘funded’ (which implies more financial commitment than ‘contribution’) for road network improvements which are required as a direct result of new housing, we are concerned this may lead to a reduction of the affordable housing percentage delivered (which should be 40% in most cases). This concern is in part due to a change in Section 4.2.40, where there is in our view some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). This concern applies to other developer funded projects including Wisley cycle networks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/859  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, we feel this does not account for more recent political and economic changes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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We object to Policy A25 Gosden Hill Farm, in that even though housing numbers at this site on the surface seem to have been revised slightly downward to 1700 from 2000, in actual fact the wording in Policy A25 now states ‘Approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period’. This seems to be attempting to indicate a change which in reality may not exist, and is misleading.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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We object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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We object to site A58 Burntcommon, which has now become a ‘Strategic Employment Site’. The overall burden on Send (and West Clandon) of the minimum of 7000sq m of industrial space (i.e. could be much larger) is greater than the now deleted up-to 7000 sq m from the neighbouring site A43 Garlick’s Arch. This is a net gain in traffic and congestion in this area. The proposed insetting of Send Business Park from the Green Belt indicates GBC’s increased emphasis and ambition for growth of this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/863  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

We note that the local road strategy allows for 30 electric car charging points, but we would suggest that this is likely to be an underestimate in the coming 20 years, given the rapid increase in acceptance and adoption of electric/hybrid cars in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/861  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. We feel this change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which we have previously and still object to.

We object that GBC are contravening the NPPF framework stipulation in paragraph 87 which states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5). The Guildford Green Belt Group have stated that 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). This is exceptional in size and thus does not meet the criteria to demonstrate exceptional circumstances. We support instead developing and densification of brown belt and urban areas. According to Policy H13, developments should have a maximum (and minimum) densification policy to prevent developers from using land inefficiently which leads to countryside erosion and ineffective use of brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/858  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation with us. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

Also in Policy S2 housing numbers, we object to the fact that downward economic pressures (including Brexit) have not been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis on providing retail and commercial in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

Furthermore, we object to Policy S2 because we believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and we feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.

We object to the fact that in Policy S2, despite the afore mentioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:  PSLPS16/2788</th>
<th>Respondent: 15425793 / Warrick Howell</th>
<th>Agent:</th>
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<tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the removal of the Garlick’s Arch site from the greenbelt. GBC has not followed correct procedure under regulation 18 and its inclusion is therefore not legally compliant</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID:  PSLPS16/2795</th>
<th>Respondent: 15425889 / Jaqueline Appleby</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to land at A43 Garlick’s Arch being included in the Local Plan. There is no justification for removing this site from the Green Belt and there are no exceptional circumstances</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID:  PSLPS16/2805</th>
<th>Respondent: 15426017 / Heather Harrison-Tams</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
2. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
3. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
4. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley’s (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five story’s high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road s I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to building 400 houses and 7000 square metres of industrial space at Garlick’s Arch which is currently the site of ancient woodland. Brownfield areas around Guildford should be used for this, NOT precious Green Belt land. There is no road infrastructure to support these additional houses. The A3 is already backed up way before rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2799  Respondent: 15426113 / Sarah Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common because all the traffic from the proposed new 2000 houses at Wisley Airfield, 2000 houses at Godsen Hill, Burpham, and 1850 at Blackwell Farm would be directed via Send. Send is already overloaded and would become gridlocked. Noise and pollution levels would worsen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2800  Respondent: 15426113 / Sarah Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and 2 traveller’s pitches at Send Hill. There is insufficient access and I understand that there is unsafe landfill waste in this land. This development would ruin the lovely countryside in that area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6170  Respondent: 15426113 / Sarah Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
<thead>
<tr>
<th>I object to Send Village being removed from the Green Belt. The purpose of the Green Belt is to protect the countryside for the enjoyment of future generations. In the past local councillors and central government promised to protect the Green Belt and this plan reneges on this promise. Once Green Belt status is removed there will be nothing to stop local developers turning our green spaces and villages into towns.</th>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPA16/1518  Respondent: 15426177 / Kate Lee  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<th>3) I object to the Strategic Housing Market SHMA figure of 693 houses per annum as GBC refuses to publish the report and verify the figures. APPENDIX D: EVIDENCE BASE</th>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>2) I object to the congestion that development will cause and the lack of road infrastructure. POLICY I2</th>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Attached documents:</strong></td>
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</table>
Comment ID: PSLPP16/6173  Respondent: 15426177 / Kate Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to not protecting the Green Belt. POLICY P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2810  Respondent: 15426241 / Piers Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous pl
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The
development is too isolated, and even within the development
itself too spread out to anticipate a reduced reliance on private cars

  1. The increased volume of car A proposed development of 2,008 homes would result in an estimated 4,000
additional cars on the roads
  2. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas,
exacerbated by wide vehicles including increased bus and HGV movements
  3. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the
lack of pedestrian footpaths (and the space to provide them)
  4. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further
planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil
secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No
development can proceed without significant infrastructure enhancements to the A3 and Partial improvement
works on the A3 south of the site are not due to start until 2019 at the earliest
  5. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the
proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the
site, in relation to the Thames Basin Heaths Special Protection Area (SPA),Sites of Special Scientific Interest
(SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the
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both the historic features of the village maintained and the village's green spaces, including the FWA/TFM,
protected.
• I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows) -
where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments),Wisley Property Investments Ltd's (WPIL)
planning application was unanimously rejected by GBC on 8th April2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms
Meadows),Allocation A35,is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result the scale of incursions into the Green Belt is based on false premises and should be reconsidered.

1. The Council was entitled to apply constraints before determining the housing number. I believe that as well as being entitled to do this the Council should have done it. It is hard to see why in fact this has not been done. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represent constraints which should have been taken into account in determining the final housing number.

1. Having properly applied constraints if there is a need to develop in the Green Belt then “exceptional circumstances” must be demonstrated for each site. It can hardly be considered “exceptional” if in fact 65% of the housing ends up on land taken from the Green Belt. The Green Belt should trump short-term considerations such as perceived housing need, as ministerial statements and case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and Green Belt can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2819  Respondent:  15426305 / I C Dean  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 - Gosden Hill Farm

I object to Policy A25 Gosden Hill Farm.

1. The Green Belt at this point serves the important function of separating the parish of West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce, defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and the houses along The Street in West Clandon (owned by the same developer as Gosden Hill Farm) will come under enormous pressure.
1. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch, give the appearance of almost continuous development from Send through to Guildford.

1. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

1. I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon-a road which Surrey County Council says cannot be improved. This road is already very heavily used at peak times and when the A3 suffers probl It is unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement-often at speed. It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. The addition of the development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians including children walking to and from the school.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

I object to Policy A43 and A43a on Garlick’s Arch.

This site had been previously considered and rejected before the previous draft of the Plan. The site was then inserted in this draft only hours before its publication without any consultation. I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site. This is a cavalier approach to public engagement by the Council.

1. The site is not a sustainable site being far from any infrastructure facilities and transport lnks. The bus service is infrequent and being cut back and future residents will have to rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

1. The site is susceptible to flooding and development will cause harm to the ancient woodland on and by the sit

1. The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

1. The Council appears to view the development as an enabling site to obtain land and developer funding for slip roads on/off the A3. This is not an exceptional circumstance to justify taking Green Belt land. The slip road land
if needed could be safeguarded in the Plan and acquired by compulsory purchase when required. Lack of current funding for the slip roads is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so-called enabling development proposal intended to fund the rebuilding of the Howard of Effingham school was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

1. The development will put more traffic on to the A247 through West Clandon—a road which Surrey County Council says cannot be improved. This road is already very heavily used at peak times and when the A3 suffers problems. It is unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement—often at speed. It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. The development will only exacerbate the problem and make the road even more congested and unsafe for pedestrians including children walking to and from the school.

1. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6217  
Respondent:  15426305 / I C Dean  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4 - Development in urban areas and inset villages

I object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion on road infrastructure which cannot cope. For many inset villages, the public transport is utterly inadequate and is being cut year by year. Such development is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6211  
Respondent:  15426305 / I C Dean  
Agent:
POLICY E1 - Meeting employment needs

I object to this policy.

1. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with completely inadequate public transport links. Many of the jobs will be taken by people from outside the area and it is likely all travel to and from work will be by car adding to local congestion together with the attendant commercial traffic. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

1. I object to the inclusion of a strategic employment site at Gosden Hill. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6213  Respondent: 15426305 / I C Dean  Agent:

POLICY E6 - The leisure and visitor experience

I object to this policy.

The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E7 Guildford Town Centre

I object to this policy.

1. The “vision” describes protecting Guildford’s unique setting and historical character and sets out some of the ways this will be However the policy and supporting text concentrate too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. Above all, the retail development proposals must not damage the viability of the High Street.

2. There is little reference to the major elements of the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion As a policy for the town centre for the next 20 years it is lamentably short-sighted and narrow in its ambition.

3. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close /Woodbridge Meadows area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.

4. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

5. The policy fails to provide guidance on design requirements, as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPP16/6206</th>
<th>Respondent: 15426305 / I C Dean</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</th>
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<td>POLICY H1 – Homes for all</td>
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<td>I object to this policy.</td>
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<td>All the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to provide guidance on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.</td>
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<td>A much higher proportion of Surrey University students should be housed in university accommodation. The University has failed to provide sufficient accommodation in spite of the Council granting planning permissions. The policy does not do enough to rectify this.</td>
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<td>POLICY H2 – Affordable homes</td>
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<td>I object to this policy.</td>
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<td>It should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals. Guildford's popularity and location in the Green Belt, with the Surrey Hills, close to others towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. The real need is for social or “council” housing but that will not be provided by current developer-led models.</td>
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POLICY H3 – Rural Exception Homes

I object to this policy.

1. The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy.

1. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfulfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included. This will force up land values and lead to appeal

1. The criteria appear to be “identified need” and “adjoins a settlement”. There seems to be no provision to balance the desirability of the development against other considerations including harm to the Green Belt or the AO

1. The policy wording should define small, either in land size or number of units. I am concerned that if “small” is left undefined the policy could be used to justify significant development

1. The policy wording should define “closely related” and remove the “safe and easy walking distance” concept. The latter will extend the potential radius within which sites will be argued to be “closely related” – when the secondary school in West Clandon was proposed a mile was considered “easy walking distance”.

1. The wording of the policy itself does not require the local connection requirement for tenants to be permanently secured - only affordability is secured. The supporting text includes this point, but what weight does it carry at appeal?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I1 - Infrastructure and delivery

I object to this policy:

1. The Council’s methodology for assessing traffic congestion - averaging it over periods of 3hrs and ignoring the effects of junctions - simply hides the problems which will be caused by the proposed scale of development. The borough’s infrastructure is already heavily strained particularly with respect to local roads, existing congestion and public transport. The planned housing will make this far worse but CIL money cannot in general be used to address existing shortfalls but only for enabling infrastructure. The local road network has not been given sufficient consideration and bus services are being cut.

2. The Plan assumes that infrastructure is not a constraint and will be in place as needed. However, this provision is critically dependent on funders and decision makers outside the Council’s control and is in no way guaranteed.

3. It is highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

4. A key element of infrastructure seems to be the so-called “snake” across the town. The evidence that this will cause the benefits claimed for it is very skimpy and sections of it have not yet been shown to be feasible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6223  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

I object to this policy:

I am being asked to buy into something which is so vague and undefined with no defined outcome against which I can form a judgement. It is not what the intention of the work is. Is it to relieve congestion from natural growth or to relieve some or all of the congestion predicted from the Council’s planned growth? Whatever the case, significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft Plan, however, commits to building housing estates along the A3 before any of these road improvements are in place. This will lead to massive traffic disruption. Road infrastructure represents a major constraint that should have been applied to the OAN at a much earlier stage in the Plan process and not left as an unresolved difficulty in the draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6209  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to this policy.

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is just not How can it be that building 65% of all new housing on the Green Belt does not cause damage to it?

1. It does not sufficiently safeguard the Green Belt. Sacrificing areas of the Green Belt to an aggressive growth agenda is not sustainable develop Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. I object to the “insetting” of 14 villages from the Green Belt and to the wholesale extensions to the settlement boundaries in many villages. Effectively, this policy turns each village in the Green Belt into a nucleus for development.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57-sites in the Green Belt

I object to each of the proposals for the Green Belt sites in this list on the following grounds:

1. The identification and allocation of sites in this Plan is made without regard to Green Belt, infrastructure or other constrains. The Plan says that “allocating these sites does not grant Planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification in my view shows that the previous consultations were not intended to change a preconceived development agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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POLICIES

Many of the “blue box” policy statements are vague and general and incapable of providing guidance for planning decisions. The accompanying text is essential to understanding and adds much detail but its status is apparently not that of “policy”. It is certainly not possible in many cases to read across from the non-policy wording to the policy itself.

POLICY S1 – Presumption in favour of sustainable development

I object to this policy.

Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection when making local planning decisions are given. However, apparently, all incursions into the Green Belt constitute “sustainable development”. It is clear that economic growth is the overriding factor and the policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 – Borough Wide Strategy

I object to this policy.

1. The OAN (adopted as the housing number) lies at the heart of the Plan. This number is now unsupportable (if it ever was) following the referendum.

2. The OAN can only be considered “deliverable” because the Council has failed to consider the protection afforded to the Green Belt in the NPPF, ministerial statements and local and national Conservative Party manifesto commitments.

3. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important. The Plan itself appears to recognize that infrastructure and other constraints may affect deliverability. It is unlikely that the number of houses can be built at the rate proposed.

1. Guildford is part of London's commuter belt and the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. The Plan will not significantly reduce prices or increase affordability except at the margins.

1. The Council has not taken account of constraints to development from the Green Belt and infrastructure. This approach differs from the other boroughs in S. The Plan is based on the assumption that “growth is good” and therefore “sustainable”. More consumption, more congestion, more Green Belt being taken is not a sustainable strategy.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. The edge of urban Guildford will be moved much closer to West Clandon. It will be built on Green Belt land which was to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am a householder in West Clandon village and I wish to make the following comments on the above document:

Question 1: Evidence Base. I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents do not yet reflect the post-referendum circumstances. The documents and the Plan must be modified to these into account.
- The Transport Assessment document is detailed and was published too late to study its detailed conclusions. The document appears to show that congestion will worsen significantly over the period of the Plan even if all the proposed infrastructure is built. The assessment is inadequate because it does not include the effects of junctions and averages flows over 3hr periods thus masking the impact of peaks.
- The SHMA attempts to justify an OAN based on a very aggressive desire for growth in the borough No case is made that such growth is sustainable. The assumptions and estimates are not transparent and have not been adequately scrutinized by Councillors so that people have to take on trust the work of a consultant. In any case events have overtaken the SHMA.
- The number and complexity of the documents in the evidence base have made reading, understanding, analysis and assimilation extremely difficult. The relevance and status of some of the documents is unclear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Question 2: Legal Compliance. I have no legal training. Surely this is a matter for the Council’s own advisers and the Inspector?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/998  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 3: Soundness. I do not agree that the Plan is sound for the following reasons:

- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- The draft Plan does not accord with the NPPF policies on protecting the Green Belt. The housing number has been used to justify removing numerous sites from the Green Belt amounting to 65% of the proposed housing number. Exceptional circumstances need to be shown site by site to justify removing them from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statement.
- The assumptions made in calculating the OAN are now almost certainly incorrect following the referendum.
- There is no evidence in the Plan to show that the proposed rate of building is achievable and sustainab The housing number is at least twice the achieved rate of building in the Borough over the last few years.
- The Infrastructure Plan is very weak. Much of the desired provision is not committed and/or is outwith the Council’s contro It seems very clear that infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
- The NPPF states that Councils cannot impose conditions which make development non-viable. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/999  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 4: Duty to cooperate. I have no information on which to form an opinion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3000  Respondent: 15426305 / I C Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A24 Slyfield – Objection

The development of 1000+ houses on this site with the access via Clay Lane will put a great deal more traffic onto the A3 and this will generate more traffic on the A247 from those wishing to go due south. In addition, the industrial site at Burnt Common (with a reference to a waste site) will be linked with the Slyfield Industrial Estate causing more movement of commercial vehicle on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2988  Respondent: 15426305 / I C Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A25 – Objections

1. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of the green belt.
2. If this development proceeds, it leaves a narrow strip of Green Belt remaining between Guildford and West Clandon. The same developer who is promoting Gosden Hill has several times tried to develop this land for housing. The current policy on treating green belt land as a developable resource means that it is only a matter of time before the village is joined up with the urban area.

3. The development will be highly visible from the A3 when approaching Guildford.

4. Together with the developments at Garlick’s Arch and Burnt Common there will be an almost uninterrupted ribbon of development along the A3 extending 5 miles from the centre of Guildford.

5. The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is stationary every day during rush hours. The linking of the A3100, A2215 and A247 would channel large amounts of traffic onto the narrow, winding road through West Clandon and Send.

6. The proposal for a link road to bring traffic from the Gosden Hill development to a 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon and Send - a road which is already under traffic stress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3001  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35 Wisley – Objection

The development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land at Wisley will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction (said to be to relieve the impact of this development on Ripley) do get built, traffic on the A247 will increase dramatically. I can see no recognition of this in the Plan and no plans to alleviate this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2998  Respondent: 15426305 / I C Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### Policy A58 Burnt Common – Objections

This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously. The Plan calls for a minimum of 7000sq. m (previously in the 2016 Plan a maximum figure) but will take 9.26 hectares out of the green belt. There is no proper justification given for taking the additional land.

1. The evidence base does not support this scale of additional industrial space and the justification for placing it in the green belt is not made out. The 2017 Employment Land Need Assessment shows a demand for about 4 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the green belt.
2. A far better use of land would be to redevelop some of the inadequate and rather decrepit industrial premises not encroach on the green belt.
3. The reference to waste management facilities mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and should not be so casually included for this site.
4. The A247 through West Clandon and Send is likely to experience large volumes of additional traffic including heavy vehicles generated by the proposed light industry, storage, distribution and waste management activities at Burnt Common. There is also the likelihood of commercial vehicle traffic between Slyfield and Burnt Common particularly when the Clay Lane access is built which will impact the same road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

### Policy ID1 Infrastructure – Objections

1. Even if all the infrastructure listed in App C to the Plan is provided in a timely fashion, the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes” and also that congestion at junctions will increase (but this is not modelled so we don’t know by how much or where). Residents are being asked to accept very large amounts of development but to take it on faith that Highways England’s as yet unformed plans will solve the problem of the A3.
2. The cumulative effects of the developments in the north east of Guildford are certain to have a devastating impact on the A247 through West Clandon (and of course on Send) and it is hard to see how any of the infrastructure proposals in the Plan (App. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is well known that they have no money available.
3. Developers are now expected to fund nearly all of the infrastructure elements and planning permission will be refused if timely provision of infrastructure cannot be secured. I question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. It is very likely that each refusal on those grounds will be appealed and it is unlikely that the courts will come down on the council’s side in all cases. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. Problems will have arisen before infrastructure will be put in place.
4. If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.
5. The developments in the north east will draw very large amounts of additional traffic to the A247 through the village of West Clandon and there is no reference to this in the Plan. The employment sites and schools will cause considerable additional traffic on the A247 generated by:

- residents moving around the area
- children from elsewhere being delivered to Gosden Hill schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
- SCC’s business plan for Newlands Corner

The A247 through West Clandon is classified as an A road but it has none of the characteristics and should be downgraded. The road is a well-known problem (to Surrey Highways for example) and a number of domestic planning applications have been turned down on highways objections. It is quite unsatisfactory to even consider putting more traffic on a road that:

- is less than 2 vehicles wide in places
- does not have continuous footpaths
- has several very sharp bends
- has a hump-backed bridge with poor sight lines
- has many properties with very poor exit sight lines
- has a very difficult and dangerous junction with the station access road
- has a dangerous junction with the southbound A3 on-slip road
- is largely unlit
- has a primary school
- is already very congested at times

1. it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on the A247 over and above that in the 2016 draft to which residents strongly objected. The A247 is quite unsuited to coping with additional traffic and there is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P2 Introduction – Objection

1. The removal of green belt protection from the prison site means that it is likely to come forward for housing development. Access to the site will necessarily involve the A3/A247 junction and put additional traffic onto the A247.

Policy P2 Green Belt - Objection

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1. The Plan fails to demonstrate that exceptional circumstances have been identified for each site that is to be taken from the green belt. The scoring system used to classify pieces of green belt was deeply flawed and assumed that because the housing number could not be accommodated on brownfield or previously developed land in the green belt, it is therefore legitimate to move the boundaries. The Plan implies that it is legitimate to have a blanket change to green belt boundaries to meet the housing number. That is not in accord with the NPPF or ministerial statements.

2. The Plan claims that in fact more housing could be delivered than the OAN which implies that excess land is being taken from the green belt. Doubtless some of Woking B.C’s shortfall will be built in Guildford.

3. The green belt appears to be functioning as a resource to be developed whenever the borough claims it is short of development land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Soundness of the Plan – Objection

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1. The many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land have been ignored in the main. There is no evidence of a collective vision on green belt. In my area more land is being taken from the green belt.

2. There is no hard information available on any future plans for alleviating congestion on the A3 between the M25 and the town in spite of this being acknowledged as one of the major causes of public discontent. Residents are not able to know what the future holds.

3. There is no recognition of the cumulative impacts of the concentration of development in the north east of the town centre all of which will generate traffic on the A247:
   - Gosden Hill
   - Slyfield
   - Garlick’s Arch
   - Burnt Common
   - Wisley
   - 4-way junction near Send/Burnt Common
   - slip roads to the A3 off the A247
   - diverting traffic from the south to go around and not through Guildford

1. The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1523  Respondent: 15426337 / C Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. I believe the SHMA report to be inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2814  Respondent: 15426337 / C Cope  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wisley Airfield (A35) and Garlick’s Arch (A43) are in locations that do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. The sites are totally unsustainable. There are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2815  Respondent: 15426337 / C Cope  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed and there are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. So why was a brown field site at Burnt Common, capable of accommodating approximately 100 houses, removed from the Plan and replaced with the Garlick’s Arch site? There was no proper consultation in relation to the inclusion of this site.

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the sustainable employment policy (Policy E1)</td>
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<td>Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable</td>
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<tr>
<td>I object to the loss of rural employment (Policy E5)</td>
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<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages.

Also, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. The road surfaces are in a poor condition with many potholes. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths and are unlit at night. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I object to the lack of proper infrastructure planning for sites

I have serious concerns over the planning of the infrastructure requirements and wonder that any will be put in place at all.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I know as I live there. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse. The M25 is at a standstill in this area most of the time. Traffic through Ripley village is unbearable and not just at peak times. The restricted width in Newark Lane means most lorries and vans cannot turn down there and 2 cars cannot pass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6193   Respondent: 15426337 / C Cope   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6215   Respondent: 15426337 / C Cope   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to poor air quality concerns (Policy I3)

The high level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6191  Respondent: 15426337 / C Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the Local Plan as the development proposed will not be sustainable

The development of over 13,000 homes is not sustainable. It will have a permanently detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6196  Respondent: 15426337 / C Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to development in areas which are at risk of flooding (Policy P4)

The drainage in these areas cannot cope at the moment. We suffer from flash floods and road closures particularly around Ripley and Ockham. There is nothing in place to rectify this. More building will only increase the flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the Borough Wide Strategy (Policy S2)

It is clear that this is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a merging of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6205  Respondent: 15426337 / C Cope  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan based on the impact it will have on the special countryside of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6214  Respondent: 15426337 / C Cope  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1527  Respondent: 15426369 / Harvey West  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15426369 / Harvey West</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT to Policy A25, Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy A35, former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
1. I OBJECT to the inclusion of strategic site Policy A43 Garlick’s Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send,Burnt Common,Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send,Send Marsh,Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2812  Respondent: 15426369 / Harvey West  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, The proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common,Send and West Clandon,with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2816  Respondent: 15426369 / Harvey West  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2813</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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1. I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6219</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>Comment ID: PSLPP16/6227</th>
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<th>Comment ID: PSLPP16/6225</th>
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1. I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/2847 | Respondent: 15426657 / Jean Birkby | Agent: |
I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2844  Respondent: 15426657 / Jean Birkby  Agent:

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2832  Respondent: 15426657 / Jean Birkby  Agent:

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common,
Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2836  Respondent: 15426657 / Jean Birkby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2843  Respondent: 15426657 / Jean Birkby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2838  Respondent: 15426657 / Jean Birkby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
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<tr>
<th>Comment ID: PSLPP16/6247</th>
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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/6235</th>
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<th>Comment ID: PSLPP16/6229</th>
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I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/6242  Respondent: 15426657 / Jean Birkby  Agent:

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2846  Respondent: 15426721 / S Mayersbeth  Agent:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/2833</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2842  
Respondent: 15426721 / S Mayersbeth  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2841  
Respondent: 15426721 / S Mayersbeth  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6246  
Respondent: 15426721 / S Mayersbeth  
Agent: 

Page 428 of 2543
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6234  Respondent: 15426721 / S Mayersbeth  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6232  Respondent: 15426721 / S Mayersbeth  Agent:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPP16/6245  Respondent: 15426721 / S Mayersbeth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2826  Respondent: 15426817 / Lynn Currall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2828  Respondent: 15426849 / Ian Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the building of 45 houses at Clockbarn Nursery. The added traffic will bring congestion and hazards to an already busy and narrow country lane. The Business Park on Tannery Lane is already working at capacity so it is impossible to imagine how the traffic would be managed at the junction of Tannery Lane and Send Road. A cursory glance demonstrates how difficult that junction is to navigate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2829  Respondent: 15426849 / Ian Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to building 400 houses and some 7000 sq m of industrial space at Garlicks Arch. The site floods and is an ancient woodland. The industrial space, if needed, should be at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2830  Respondent: 15426849 / Ian Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to a new interchange with the A3 at Burnt Common. With the proposed developments at Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm will bring gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2831  Respondent: 15426849 / Ian Shaw  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inappropriate location as the narrow single country road provides insufficient access. Any development there will encroach on the beautiful amenity countryside setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6236  Respondent: 15426849 / Ian Shaw  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send village being removed from the Green Belt. Send's Green Belt provides an essential buffer, stopping Woking and Guildford becoming one sprawling urban mass. As I understand it our local council and government promised to protect the Green Belt and I would ask this promise to be honoured.

If Send loses its Green Belt status, it will mean more house building, more industrial building, more heavy lorries, more traffic congestion, noise, overcrowded doctors surgeries and added pressure on schools.
Comment ID: PSLPS16/2835  Respondent: 15426945 / Sue Kilpatrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Cobham & Downside Residents’ Association object to the above draft Local Plan on the following grounds:

• The removal of the former Wisley Airfield from the Green Belt – the Green Belt prevents the urban sprawl and no exceptional circumstances have been established to warrant such a removal

• There is ample brownfield land in urban areas which need to be regenerated

• There would be a disproportionate allocation of a proposed increase in housing to the settlements of Ockham, Hatchford and Downside

• Harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs to service the development

• The assertion that the development would result in a considerable increase in cycling and walking is astonishing. There is insufficient space to provide cycle lanes/footpaths and those attempting to cycle or walk could be put at risk

• There would be an increase in the already severe congestion on the A3 and M25 and the junctions of those major roads as well as local roads

• The lack of suitable public transport

• Air quality has not been given serious consideration. Air pollution in this area already exceeds DEU-permitted levels, affecting adversely the health of current and future residents

• Objections are supported by the unanimous rejection of Application No 15/P/00012 by the Planning Department of Guildford Borough Council on 8 April 2016

The reasons for not removing the former Wisley Airport from the Green Belt are overwhelming and it is very much hoped that the Consultation will result in the Green Belt status being retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/6239  Respondent: 15427073 / Andrew Sharp  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire): (*)*

Please take this as a formal objection to the insetting of Chilworth. This is an area of natural beauty and should not be developed further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/16528  Respondent: 15427105 / Helen Taylorson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire): (*)*

However I do agree that smaller homes need to be built as there are presently several large houses on the market that would appear to have been on the market for some time. The population is ageing and there is little provision of houses for the elderly. It is well known that the population of East Horsley is very active and that many activities take part in the village Hall – ie the centre of the village. The proposed site in Ockham road North appears to be a well sited area for homes for the elderly and for starter homes.

I feel strongly that consideration needs to be given to building a retirement village that would provide homes for the retired in the village but would enable far less use of cars. Any family homes built inevitably mean more cars and often not enough parking spaces.

The Thatchers Hotel site or the Ockham road site would be perfect for a retirement village so long as the homes built were low and built in keeping with local architecture. There are many such sites in other counties – Linden Village Sunninghill,Berkshire  Bramshott Place, Hampshire, Elmbridge Village, Cranleigh – all have been well designed and bring people of a certain age and time in their life together. Car ownership is discouraged and community transport is provided. Outings, hobbies, sports, interests are all encouraged on site enabling those recently bereaved or who find themselves single able to take part rather than living a possible lonely existence.

I would dearly love to see more thought given to retirement village living as being a useful solution to some of the housing needs in Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The local schools are oversubscribed, doctors surgeries are also under immense strain and the local narrow tree lined roads were not built for the volumes suggested.

I travel to work by car to Guildford most days and my journey varies in time depending on the traffic at the Duke of Wellington Pub and A246.

This is already a bottle neck and I cannot imagine what it will be like if 500 new homes are built in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
There has been no demonstration as to what exceptional circumstances there are for taking East Horsley out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16526  Respondent: 15427105 / Helen Taylorson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of East Horsley for over 25 years I wish to place on record my objection to some of the proposals AFFECTING East and West Horsley in the Guildford Local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2848  Respondent: 15427169 / Nigel Hird  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to add my objection to the proposed massive development of Normandy for the following reasons:

1) I do not oppose some development, say 100-200 houses in the village if it is well planned with retail outlet etc, but the proposed 1100 is just crazy and totally out of proportion to the size of the village.

2) The road through Normandy already queues in rush hour, it could never cope with all the extra houses in Normandy, Ash and Tongham. New roads would be necessary.

3) The land flash floods, developing it will cause further flooding in the village.
4) It really 8 form ‘entry’ rather than an 8 form total school? Is that 8 forms x 7 years x 30 pupils = 1680 pupils in a small village!! How could Glaziers Lane and the surrounding lanes cope with that!

I realise there is pressure to develop further areas, but it really seems that no thought or logic has gone into this proposal whatsoever. It even makes one wonder if there is some kind of hidden financial interest to propose such a crazy scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7599  **Respondent:** 15427169 / Nigel Hird  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to add my objection to the proposed massive development of Normandy for the following reasons:

1) I do not oppose some development, say 100-200 houses in the village if it is well planned with retail outlet etc, but the proposed 1100 is just crazy and totally out of proportion to the size of the village.

2) The road through Normandy already queues in rush hour, it could never cope with all the extra houses in Normandy, Ash and Tongham. New roads would be necessary.

3) The land flash floods, developing it will cause further flooding in the village.

4) It really 8 form ‘entry’ rather than an 8 form total school? Is that 8 forms x 7 years x 30 pupils = 1680 pupils in a small village!! How could Glaziers Lane and the surrounding lanes cope with that!

I realise there is pressure to develop further areas, but it really seems that no thought or logic has gone into this proposal whatsoever. It even makes one wonder if there is some kind of hidden financial interest to propose such a crazy scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2849  **Respondent:** 15427329 / Christina Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the building of 45 houses at Clockbarn Nursery. The added traffic will bring congestion and hazards to an already busy and narrow country lane. The Business Park on Tannery Lane is already working at capacity so it is impossible to imagine how the traffic would be managed at the junction of Tannery Lane and Send Road. A cursory glance demonstrates how difficult that junction is to navigate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2850  Respondent: 15427329 / Christina Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and some 7000 sq m of industrial space at Garlicks Arch. The site floods and is an ancient woodland. The industrial space, if needed, should be at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2851  Respondent: 15427329 / Christina Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common. With the proposed developments at Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm will bring gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inappropriate location as the narrow single country road provides insufficient access. Any development there will encroach on the beautiful amenity countryside setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/6248  Respondent: 15427329 / Christina Shaw  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to Send village being removed from the Green Belt. Send's Green Belt provides an essential buffer, stopping Woking and Guildford becoming one sprawling urban mass. As I understand it our local council and government promised to protect the Green Belt and I would ask this promise to be honoured.

If Send loses its Green Belt status, it will mean more house building, more industrial building, more heavy lorries, more traffic congestion, noise, overcrowded doctors surgeries and added pressure on schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/6250  Respondent: 15427489 / Andrew Isherwood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

I object to Send village being removed from the Green Belt. Send's Green Belt provides an essential buffer, stopping Woking and Guildford becoming one sprawling urban mass. As I understand it our local council and government promised to protect the Green Belt and I would ask this promise to be honoured.

If Send loses its Green Belt status, it will mean more house building, more industrial building, more heavy lorries, more traffic congestion, noise, overcrowded doctors surgeries and added pressure on schools.
It is critical that the character of the town is preserved. The local plan fails to ensure this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6249  Respondent: 15427489 / Andrew Isherwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having reviewed the local plan I fear that it is poorly conceived and based upon weak/flawed data.

I do support the response from the Guildford Residents Association.

I oppose the expansion of Guildford by 35%.

Insufficient consideration has been taken of brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/649  Respondent: 15427489 / Andrew Isherwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed evidence, Guildford's proposal for more than 12,426 homes is excessive and will result in needless loss of Green Belt and character. It will also result in increased congestion that cannot be justified in our heavily constrained borough.

Population estimates and growth estimates are over-inflated

Congestion is severe and requires step-change remedial action before any further housing is approved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the above proposed submission (Local Plan) for Normandy and Flexford

My objections area as follows:

1. The proposed development (1100 homes) is developer led with the carrot of them providing land for a secondary school – which is not needed

The two local secondary’s (Ash Manor and Kings College/Park Barn) are both undersubscribed and have extra capacity for expansion should they reach their capacities on their present sites and are willing to expand should the need arise – money would be better spent improving and upgrading these.

1. Other secondary’s in the area are also expanding school places at Guildford county and St Peters, Merrow.

Infrastructure – Traffic for the proposal (school and homes) would feed on to minor roads and not directly onto A class roads so causing further strain and overload onto the village at Peak Times. The A323 is already well over capacity and any problems on the A31(Hogs Back) causes and lock regularly

There are no plans to upgrade/improve the A323 in the foreseeable future

Furthermore Westwood lane and Glaziers lane are both bisected by the railway line – both are ‘dog-legged’ and one can only take alternative flow traffic

• Exceptional Circumstances – GBC has to demonstrate such circumstances to justify releasing site A46 from the green belt – it has not dove this there is no evidence let alone clear evidence, furthermore
  1. Environmental aspects have been disregarded
  2. Flexford and Normandy are separate settlements but have been ‘lumped together’ for simplistic and analytical purposes
  3. Flooding has been ignored and is a problem
  4. The doubling of the population is not viable nor sustainable

1. In conclusion I strongly oppose the proposed development. Development of brownfield sites, smaller, sensitive and logical methodology is needed where expansion is scattered and better planned

Existing approvals gained by developers that they are merely ‘sitting on’ looks better as an appreciating ‘asset’ on their balance sheet should be developed first-will a ‘stick’ if necessary (ie rescind the approvals).

The University is also sitting on land until permission for student accommodation AND staff accommodation – exactly where it is needed! This would free up property around the town where it is most needed and minimise the burden on infrastructure.

The deep mistrust that GBC exudes is enormous – villagers do not trust their councils – recent events in the past 2-3 years has fuelled this. The council has little to be proud of in the way this and previous planning policy local plans have been handled

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C).

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the Plan depends. For each of the Key Allocated Sites in the Borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing I believe that as well as being entitled to do this the Council was required to give proper consideration to
constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

2. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1533  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

23. APPENDIX D

I OBJECT to the SHMA figure of 693 houses per annum in the Borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too
- A professional review by NMSS (a housing demographics consultant) has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the Borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the Borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2855  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 – A247 near Shell garage - Three vehicles collided causing delays Surrey Fire and Rescue

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Send Marsh Road - Motorcyclists with injuries airlifted to hospital

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and Surrey County Council (SCC) is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Green Belt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday Book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2856  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

21. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the Draft Plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council may have been attracted by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the Plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding should be available for it. (One of the reasons for turning down the so-called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running South past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement - often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for Southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The addition of North facing ramps to the A3 at Burnt Common would have serious repercussions for local communities. There is no requirement for local traffic to access the A3 to the North, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the East of Guildford (Merrow etc.) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas, as the traffic would be on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
West Clandon and the villages and amenity areas around it constitute at present pleasant and peaceful semi-rural habitation. The proposed housing changes would evidently change all of that, resulting in a quasi-urban environment which is not what the local peoples wish for. I understand that there may be a need for increased housing, but would question whether that should be done at the cost of destroying much of the quality of life of existing residents. There are other areas where such developments could be done without such consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6264  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the Borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/6273  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the Borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
15. POLICY D3

I OBJECT to Policy D3 - Historic environment.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which leaves plenty of scope for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6275  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages.

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6260  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1).

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is an alternative brownfield site very close by.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6261  Respondent: 15427617 / Ken Scotland  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2).

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6262  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6279  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment or “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the Plan’s explicit priorities should be:

1. To protect the Borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value visitors. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6270  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre.

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.
There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6268</th>
<th>Respondent: 15427617 / Ken Scotland</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. POLICY H1

I OBJECT to Policy H1 – Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free-up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the Plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to
accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and
under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and
there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6269  Respondent: 15427617 / Ken Scotland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility, and that it should be more firm and
explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the Plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of over £360,000 the discounted price is still not going to be affordable to anyone on a normal
income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council
houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing
the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6277  Respondent: 15427617 / Ken Scotland  Agent:
17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy.

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances”. The wording of the policy is far too wide, so compromising all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no facility to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the Plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development, then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances”. The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow: wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever more popular past-time, particularly at weekends when hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road traffic accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring additional accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The Borough’s infrastructure is already heavily strained. However the Plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problems, which will get
worse as development proceeds. The schemes referred to in this Policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this Plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the Plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the Borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This Plan, however, assumes infrastructure will follow the needs of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of Community Infrastructure Levy (CIL) income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to, capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision for increased capacity of Guildford’s hospitals: where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15427617</th>
<th>Agent: Ken Scotland</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6267 | Respondent: 15427617 / Ken Scotland | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the North East of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built-up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6258 | Respondent: 15427617 / Ken Scotland | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the Borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in apparently protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need is not itself an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. It appears that the Plan has fallen into the developers’ hands, and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.)

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infill and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the Plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the Borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused a lot of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. Mere housing need does not constitute a ‘special circumstance’, so there are no exceptional circumstances for these sites and villages to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The proposed development in these villages will result in the character of these villages being lost and the countryside encroached.

Guidford Borough Council's (GBC’s) Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development: however, other considerations (e.g. traffic congestion) should preclude the use of this site also.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/6259</th>
<th>Respondent:</th>
<th>15427617 / Ken Scotland</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

4.POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 Strategic Flood Risk Assessment (SFRA) has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the National Planning Practice Guidance (NPPG)) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My detailed objections are listed below.

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016). In my opinion the Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The National Planning Policy Framework (NPPF) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to rely on motor vehicles. These sites are also
unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6252  Respondent: 15427617 / Ken Scotland  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

My main objections to the Local Plan are on the grounds of the large increase in traffic that is bound to ensue through the village of West Clandon, and to object also because of the consequent destruction of Green Belt lands. The detailed comments below on the paragraphs within the Local Plan have been prepared by others, but nevertheless accurately and succinctly reflect my own views, and are therefore largely unaltered.

Traffic in West Clandon is significant in off-peak times, and becomes congested for most of the peak-traffic times, with frequent tail-backs from the Clandon Road/Portsmouth Road roundabout (A246/B2215) to the West Clandon/Guildford Road cross-roads (A246/A247). As the present Clandon Road (A247) cannot cope with peak traffic demands, and any significant improvement in traffic handling on that road would require many houses in the village to be removed and house frontages drastically reduced, so any proposed significant increase in traffic would appear to be the result of inadequate or negligent planning. You will be aware that as recently as 12.07.16 there was yet another traffic accident in the village, this time involving two cars. As a pedestrian walking on the narrow pavements (which are sited on only one side of the road, there being insufficient space for pavements on both sides) I frequently see vehicle debris lying at the road side, presumably as a result of vehicles side-swiping one another on the narrow road. I also not unusually have to have my car mount the pavement in order to pass on-coming wide vehicles (or for them to have to do so).

You should also be aware that traffic congestion in Guildford usually results in congestion on the A3 and A246 leading into Guildford, which then causes severe congestion on the A247 through West Clandon, presumably as traffic on the other two routes tries to find alternative routes. The proposed housing developments in the Gosden Hill and Garlick Arch areas would only result in grid-lock through the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6257  Respondent: 15427617 / Ken Scotland  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. POLICY S2
I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite substantially.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the Strategic Housing Market Assessment (SHMA) and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s Objectively Assessed Needs (OAN) is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The Plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan”
that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the Borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% Area of Outstanding Natural Beauty (AONB) and about 75% protected by Special Protection Area (SPA)). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number, the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been skewed towards growth without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites, and through increasing the housing density of existing built-up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is therefore unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1005  Respondent: 15427617 / Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

20.A. Question 1: The evidence base and submission documents

"The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?"

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
20.A.Question 2: Legal Compliance

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the "

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by over 20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SQLP16/1007 | Respondent: | 15427617 / Ken Scotland | Agent: |
|-------------|--------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A.Question 3: Soundness

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the "

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green" Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

1. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

2. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

3. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

4. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

5. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

6. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

7. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

8. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

9. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

10. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

11. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burgham which have to be met by the developer These include Electricity Grid supply problems and sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

12. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
13. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

1. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
2. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
3. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
4. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites given priority over commercial development and greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1008  **Respondent:** 15427617 / Ken Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

20.A. Question 4: Duty to cooperate

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the "

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2853  Respondent: 15427649 / Alan Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I am not a resident of Guildford Borough Council, as a resident of Cobham (Elmbridge) I would be adversely affected if the above Plan were to be approved, bearing in mind the proximity of the former Wisley airfield to Cobham. I request you to reject the Plan, in particular for the following reasons:

1. The area of the former Wisley airfield serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
2. No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
3. There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
4. There would be a disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
5. My home town of Cobham is the closest shopping area to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic.
6. There is a lack of public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
7. Protected species on and near the site and wildlife corridors would be destroyed.
8. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/1529</th>
<th>Respondent: 15427745 / Barry Nelson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The Plan does not adequately, or all at, address the issues around the provision of services - gas, electricity, waste management, fresh water, effluent, and surface water all of which would require major works affecting, in particular, the Burpham area</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The SHMA appears to be flawed and the suggested housing need it too high and not provide for the impact of Brexit which could have a significant impact on housing need. I know an independent report commissioned by the Guildford Residents Association contradicts the GBC report in many respects and provides for a significantly lower need figure (without allowing for Brexit). The proposed borough population increase of some 25% would put unsustainable pressure upon an area that is already congested in many respects.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan does not address the issues around access to the A3, the possible construction of the relief Tunnel that could well be designated to commence within the area covered by the Plan. A corollary of this is the Plan does not address the very significant impact the proposals would have upon (a) traffic movement within the Burpham and Merrow areas and (b) the consequential effect in terms of environmental pollution - vehicle emissions and noise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/6274</th>
<th>Respondent: 15427745 / Barry Nelson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development of Gosden Hill Farm would have a massive impact on Burpham. It would put thousands more vehicles in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2854</th>
<th>Respondent: 15427745 / Barry Nelson</th>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan does not adequately, or at all, address the massive impact, particularly in the shorter term, the proposals would have upon - schooling, business, traffic movement and parking within the Burpham area. The proposal for a 40% increase in retail space not only goes against national and local trends but would further contribute to traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6276  Respondent: 15427745 / Barry Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed Sustainable Movement Corridor is, frankly, laughable and could not possibly be delivered given the narrow roads and pinch points. If the SMC were implemented it would create general chaos with the immediate surrounds and make Burpham 'impossible'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6278  Respondent: 15427745 / Barry Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National policy attaches great importance to the nature of Green Belt. The Plan does not offer, any, or sufficient, evidence of the exceptional circumstances required to justify allocating Green Belt land for the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6272  Respondent: 15427745 / Barry Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan does not offer any constraints to protect the character on Guildford, which is already very congested. Other boroughs within the area are applying constraints to overall housing growth - Guildford is not. The Plan does not acknowledge the 'identities' of villages threatened by the proposals which includes Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1003</th>
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</table>

I believe the plan is unsound, unsustainable and lacks credibility given (a) the lack of attention to the infrastructure required to 'support' the plan and (b) the very significant impact the Plan would have on the local community in particular New Inn Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1004</th>
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<td>Document:</td>
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The Plan does not have due regard to the Burpham Neighbourhood Plan 2015 adopted by GBC only last year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/2868</th>
<th>Respondent:</th>
<th>15427937 / Elizabeth Lawes</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object;
To the building of Houses at Clockbarn Nursery as the access is so poor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/2869</th>
<th>Respondent: 15427937 / Elizabeth Lawes</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object;
To the building of 400 houses at Garlick's Arch, this IS Greenbelt , also a flood area, and increased access by cars etc would be a danger to Local residents. Warehousing should be based at Slyfield were their already is an industrial Estate with adequate access and fewer residential house to upset. I object to taking down more of our beautiful old trees and woodland which has existed since the 16th Century. There are so many industrial sites which remain empty after building, is this going to be the case here. waiting to be vandalised, graffiti and made to look an eyesore.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/2870</th>
<th>Respondent: 15427937 / Elizabeth Lawes</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I Object;

This is my strongest objection. To 40 houses (Maybe) but two travellers sites at Send Hill. I am terrified, already travellers are going up and down the narrow lane VERY VERY fast on their house and trap. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. The road is too narrow and dangerous. My house would lose value and I would HAVE to install major security metal fencing.[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic and persons who do not share it] I would seriously think of moving out of the area. I am terrified already, I very very rarely see a police car patrolling the lane as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6296</th>
<th>Respondent: 15427937 / Elizabeth Lawes</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I Object;

To Send losing its Greenbelt status, I have personally never received any information regarding this point. Local Councillors promised this area would remain Green but know due to some developers 'needing' their large profits this does not seem to matter to them. Send would no longer exist and would merge with Woking, Clandon, Ripley and even further afield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6297</th>
<th>Respondent: 15427937 / Elizabeth Lawes</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I Object;

To the new Burnt Common interchange to A3 for 2000 Wisley houses, 2000 houses at Gosden Hill and 1850 houses at Blackwell Farm. Is there really the need to build so many house in one small area, could these houses not be divided up and built a few in many other areas to avoid congestion through Send. We often have traffic issues and many mothers walk to school at present with many small children which would make this trip quite dangerous for them, so much traffic for so many houses. This is a small Village, what impact will this make on local services i.e. Doctors Surgery, Guildford and St Peters Hospitals (which are already stretched beyond belief), Police Force, Council Services (who have already cut down collection times) Street maintainance (already our roads are in a poor state of repair)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1536  Respondent: 15427969 / Chris Mealing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1535  Respondent: 15427969 / Chris Mealing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlik's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/6293  Respondent: 15427969 / Chris Mealing  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6288  Respondent: 15427969 / Chris Mealing  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/6286  Respondent: 15427969 / Chris Mealing  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infra-structure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/6290  Respondent: 15427969 / Chris Mealing  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2871  Respondent: 15428033 / Michael Wells  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the Plan. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London.
- I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and the development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary
school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

1. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   • I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   • I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Pl The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
   • I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1539  **Respondent:** Bridget McClellan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to the draft Local Plan for the following reasons.

PLANNED HOUSING NUMBERS
I OBJECT to the number of planned houses rising from 652 to 693 over the next twenty years. The way this has been assessed and calculated is not at all transparent and is more than double figures used in previous plans.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2879  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. THREE FARMS MEADOWS SITE (Wisley Airfield) Policy A35

I STRONGLY OBJECT to the location of a new town with some 2000 new houses in the middle of the greenbelt in the middle of nowhere. This planning application was unanimously rejected by the GBC planning committee recently on 14 separate grounds. The site is located miles away from any public transport, is on a site that floods regularly and is surrounded by narrow, muddy, winding, unlit country lanes. The addition of at least 4000 cars will cause a constant gridlock throughout the area. An assumption that residents will walk or cycle to reach amenities is completely unrealistic. An infirm pensioner cannot be asked to walk along these narrow lanes to the doctor and to expect them to cycle would be unacceptable. There is no employment nearby which would result in a huge growth of commuter traffic on the A3 and nearby country lanes causing more pollution and traffic jams; commuter trains are already standing room only and this new town would increase the number of commuters and cause chaos on a daily basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6312  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LEISURE AND VISITOR EXPERIENCE. Policy E6

I OBJECT to this policy, the Guildford area does not need "new" attractions, the whole point of the attraction of Guildford is its historic nature and quirkiness. The countryside, purely as it is, in its natural state is a big tourist attraction, to add "attractions" is completely missing the point, the countryside is what people want to enjoy, not a huge concrete car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6313  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD TOWN CENTRE. Policy E7
I OBJECT to this policy, more residential use of land should be provided within the town centre, which is where the young and less well off would much rather live - ease of access, no travel costs and existing infrastructure and facilities. The greenbelt should not be built on just because it's easier for developers, regenerate and reuse in these times of being eco friendly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6308  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES
1. SITES IN EAST AND WEST HORSLEY
I OBJECT to Sites A36 to 41 inclusive. They will effectively destroy these historic villages. New housing will put an intolerable strain on facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewerage and surface drainage to name but a few. The housing density is inappropriate and far greater than anywhere in the locale at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6310  Respondent: 15428097 / Bridget McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
DOCTORS AND SCHOOLS Policy I1, Infrastructure and delivery
I OBJECT to the strain all the extra people will put on medical facilities. It is very difficult to get a doctor's appointment even now and all local schools are full to overflowing with "temporary"classrooms dotted around.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6315  Respondent: 15428097 / Bridget McClellan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

INFRASTRUCTURE AND DELIVERY. Policy 11
I OBJECT, infrastructure is already hopelessly congested and cannot cope with even organic growth. The policy does not seem to mention roads and traffic which is the major cause of congestion, anyone who drives either up or down the A3 at any time of day will tell you how congested it is. Adequate infrastructure MUST be a pre condition of sustainable development. Greenfield sites present huge infrastructure problems and brownfield sites already have it in place, so it is much more sensible to use brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6309  Respondent: 15428097 / Bridget McClellan  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS. Policy 13
I OBJECT, as often the proposed sites are remote from existing bus stops, stations and even roads with pavements. This assumes that people will stop using cars as transport methods. This assumption is unrealistic as has been proved time and time again in new developments resulting in parking chaos around the developments as residents try and park near home and traffic snarl ups.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PERCENTAGE OF NEW HOUSING ON GREENBELT Policy P2
I OBJECT to the large percentage of new Borough housing being built in the current greenbelt. There are more than enough brownfield sites and urban area that require re-development. Those should be used before destroying greenbelt which is an accessible amenity for all.

EAST AND WEST HORSLEY BEING REMOVED FROM THE GREENBELT Policy P2
I OBJECT to East and West Horsley being taken out of the greenbelt. These are green, rural villages with narrow country lanes running through them and contribute to the openess of the greenbelt.

GREENBELT Policy P2
I OBJECT to the wording and content of this policy which states "the general extent of the greenbelt has been retained" we are losing nearly 7% of the greenbelt when including insetting, filling and increasing settlement boundaries.

VILLAGE BOUNDARIES Policy P2
I OBJECT to East and West Horsley's boundaries being greatly enlarged. This will ruin the rural nature of both villages and cause them to become soulless dormitory towns with no heart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

DISPROPORTIONATE NUMBERS OF NEW HOUSING IN EAST HORSLEY
I OBJECT to 533 new houses. This is a disproportionate number for this part of the borough. 23% of the Plan's new housing is in the area of the Horsleys, Ockham, Ripley and Send, a rural area that has only 0.3% of GBC population. The infrastructure will collapse under the strain and chaos will ensue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals contained in the Local Draft Plan.

The number of houses proposed is excessive. An unbiased independently assessed figure is the only acceptable way to determine a true calculation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/6304  Respondent: 15428129 / K J C Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University must be made to provide its own accommodation for students and staff and implement the planning already granted to them in 2003. This would release a considerable number of family homes in the borough. The impact of the University is a major issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/6303  Respondent: 15428129 / K J C Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The infrastructure in the area cannot withstand such high additions to housing.

Traffic gridlock and pollution are already major issues. Doctors, schools, hospitals and other amenities are already stretched to their limit. Water supply and drainage are further problems which already exist.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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No development should occur on green belt land without agreement from the local community. Areas of brownfield sites exist which are suitable for housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
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• I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London.

• I object to the detrimental impact on transport, local roads and road I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCT).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Department.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.'s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1544  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   ◦ The “objectively assessed need” figure of 693 homes a year is too high.
   ◦ A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   ◦ The current SHMA inflates the proposed housing figure due to
   ◦ failure to correct for errors in the historical data for international migration flows,
   ◦ issues with the way it considers students and affordability and
   ◦ flaws in the method for estimating the number of homes needed to support job growth.
   ◦ It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2881  Respondent: 15428225 / Vian Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2882  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2883  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6326  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6323  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6324  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6325  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6331  Respondent: 15428225 / Vian Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that
order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY H3 – Rural Exception Homes**

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.
These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6320  Respondent: 15428225 / Vian Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6321  Respondent: 15428225 / Vian Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1546  Respondent: 15428289 / Vicki Donnelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to any increase in traffic on send barns lane where I live. This being the Woking – Dorking – Brighton route is heavily congested during the rush hours and I usually have to wait for 5 mins just to cross the road at the roundabout to catch the bus .

Furthermore it should be taken into account that there are two schools (Send First and Second) Further down the line people driving children have to part on the lane turning area into a bottle neck. To have more roads converging at burnt common would be accidents just waiting to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2895  Respondent: 15428289 / Vicki Donnelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object strongly to a housing development at Garlick’s Arch as this would just add to the burnt common problem also schools, medical centre and other facilities would be needed and there doesn’t seem to be any mention of them in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6342  Respondent: 15428289 / Vicki Donnelly  Agent:
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There is mention of a distribution centre which would mean more heavy traffic and offices. There is no need for these. When those that are there now were built they stood unlet for some time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I do not want to see send removed from the Green Belt or joined up with other places creating an urban sprawl. Once this happens it would be for good. The whole of the Guildford – Woking area would be one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The answer surely is for new towns, which could cope with expansion to build the houses needed? Now would be a temporary measure.

Families Grow and then where do they go? Let us keep the Green Belt and create fresh towns. I object to losing it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPS16/2886  **Respondent:** 15428865 / Marjorie Sennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I do not live in the Guildford Borough, I live much closer to the above undesirable proposed development than many others who do.

I particularly object to the Wisley site being removed from the Green Belt. This would run counter to the whole purpose of the Green Belt in preventing urban development which could ultimately see Guildford subsumed into the mass of London - there are no special circumstances that would justify this. I object also to the proposed increase in housing in Ockham, Ripley, the Horsleys and Effingham for the same reason and also because this would change the whole character of the area very much for the worse.

There would be many other harmful side effects but particularly the impact on local roads, especially the A3, and services of the increase in population. Congestion is already quite severe and the regular presence of a further 4,000 (at least) cars plus service vehicles could lead to gridlock in a number of places and there would be a serious deterioration in air quality.

Little consideration seems to have been given to the environmental and ecological value of the site and the surrounding area.

There is plenty of brownfield land that could be developed without the need to threaten the Green Belt and I hope that the council will reconsider.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6333  **Respondent:** 15428897 / David Goodrick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 509 of 2543
I am a retired SECAMB Paramedic who used the hospitals in and around Surrey. Over the years I have have seen these hospitals struggle against the increase in the numbers of patients being treated. Even when I retired 6 years ago, the ambulances had to wait excessive lengths of time waiting for spaces to become available in A&E, from what I am told by my colleagues who are still working, the situation has got much worse.

There is also a strain on the local GP's, with the numbers of doctors not going into General Practice, it is a situation that will only get worse over time.

There are insufficient places in local schools, any increase in demand will again only exacerbate the problem.

Our roads are even now grid locked, the traffic on A3 and M25 is often reduced to a crawl at all times of the day and obviously worse during the rush hour and school run.

The Guildford Borough Council plan to build over 14,000 houses is madness, even 10% of this figure would create problem.

The villages in around Guildford are currently delightful places to live, PLEASE DO NOT RUIN THEM, IF YOU DO, IT WILL BE YOUR LEGACY

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/6332</th>
<th>Respondent: 15428897 / David Goodrick</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I do not live in and around Ripley, I object to the 2016 draft local plan.

I object most strongly to any loss of the green belt. Apart from the Green Belt proving a habitat for wild animals, it provides access to the countryside for thousands of people. It also creates a barrier between urban areas and prevents ribbon development. If the proposed housing development goes ahead, eventually there would be further application to build on even more of the Green Belt, eroding it further.

New house building should be restricted to Brown Field sites only, or by infilling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/2887</th>
<th>Respondent: 15429025 / Hilary Garside</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object strongly about the proposed housing planned for Gosden Hill Farm. These are the reasons:

- My main concern is traffic and the inevitable exacerbation of an already congested area. New Inn Lane and Park Road are already at breaking point plus the junctions at London Road and Epsom Road. People going to work and children going to school will be seriously inconvenienced by more traffic. And remember these days each home has at least 2 cars!
- Local parking: will the plan provide more parking spaces for the Burpham Parade? Epsom Road in Merrow? BP Garage / M&S in Merrow? Sainsbury's? Aldi? - I think not! It will make life around here so much more stressful and unpleasant.
- Has the water table and sewage disposal been properly researched? Again I suspect not.
- Having traveller sites included will cause social tension and [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

Please acknowledge my concerns and add my name to the objectors list

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
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<th>15429153 / Claire Dodson</th>
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As a regular commuter with a young family we moved to the area for space and to enjoy the green spaces. I am dismayed to find that the plans propose to remove Horsley from the Green Belt, ruining the villages and their surrounds. The knock on impact of additional housing is of great consequence to schools, medical facilities, parking and over crowded trains. No distinction will be discernible between Horsley and any other suburb of Greater London if this building and development work is permitted to continue on the scale proposed. Our creaking drainage systems and busy roads with well known pinch points will deteriorate further with untold consequences.

I implore you to reconsider the options available, but at all costs protect the Green Belt for generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>15429281 / K A Brenner</th>
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<td>Objection to remove The Horsleys from the Green Belt &amp; specifically to the Waterloo Farm proposed site</td>
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<td>To whom it may concern,</td>
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<td>We would like to STRONGLY OBJECT to the above proposed development.</td>
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<td>We vist Horsley all the time because of the countryside feel and incidentally have friends who overlook the paddock of Waterloo Farm. We are disgusted that she will face the prospect of looking at 120 new houses.</td>
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<td>It will undoubtedly create further noise pollution as well as affecting the light of many families’ homes as well as the privacy.</td>
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<td>I am sure the roads &amp; infrastructure of the area would undoubtedly not be able to cope either</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Respondent:</th>
<th>15429441 / George Georgiou</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am writing to object to the plan of removing Chilworth from the Greenbelt and thereby removing the protection it offers.</td>
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<td>Chilworth has already seen significant number of new homes during the last 10 years and this has increased the pressures on infrastructure and public services such as on the local two schools and doctors surgery. The village is clogged with traffic during rush hours in the morning and evenings which causes chaos for the local residents. This issue does not seem to be addressed in your plan.</td>
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<td>You are planning to remove this protection and thereby looking at the maps in your plan are risking the playing fields of the school being sold and built upon. The junior school in the village serves all the surrounding villages and is therefore vitally important that this does not happen. In addition to this you seem to have removed protection from green fields at the east end of the village which would destroy the feeling of the village if built upon. The rest of the village is densely built on so I cannot see any future benefit from the insetting of the village only potential detrimental effects</td>
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<td>I therefore strongly object to Chilworth being removed from the greenbelt</td>
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<td>Comment ID: PSLPP16/6340</td>
<td>Respondent: 15429505 / Graham Griffiss</td>
<td>Agent:</td>
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I protest at the proposal to take Chilworth out of the Green Belt

The village is entirely rural nestling in the Tillingbourne Valley between St Martha’s and Blackheath, and is unobtrusive in this picturesque environment, which has enormous amenity value. It is unthinkable to open it up to the possibility of major development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<tr>
<th>Comment ID: PSLPP16/6341</th>
<th>Respondent: 15429633 / Stephen Linnegar</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Having recently reviewed the proposed developments within the GBC boundaries, I feel I must object to all of the proposals due to:

- An inadequate road network that could not cope with any additional traffic.
- The utilities cannot meet current demands yet alone an increase in demand for their services.
- The impact of thousands of proposed properties would have a huge detrimental effect on the villages (Ockham, Send, Ripley and The Clandons in particular) affected.
The local Health Centres struggle at this time to meet demand both from trying to recruit trained staff and the demand of the current population. Additional demands would see staff moral dropping and therefore the quality of Health Services will diminish further.

I would suggest that you have received many similar objections to the proposed developments.
Therefore please reject all planning applications until at least the above concerns are rectified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp173/72  **Respondent:** 15429633 / Stephen Linnegar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Having previously written stating my objection to the plans put forward at that time, I am amazed that there are further plans which would only cause greater harm to the immediate area.

My areas of concern were traffic flow increase, infrastructure capacity and the demise of the rural nature of the area.

Surely if the infrastructure was to be modernised to allow for the increased capacity prior to any developments this would assist in reducing concerns.

If ALL vehicular access to A58 (Burnt Common), A35 (Wisley Airfield) A43 (Garlicks Arch) were to made purely from the A3 carriageway this would also alleviate local concerns over traffic flow and volumes.

From the above proposed developments only foot traffic/pedestrian access should be allowed from other bordering roads and lanes.

The revised proposed plans fail to address any of the recent concerns so please note my objection to all of the above developments on the above basis as above.

Any development should be in keeping with the countryside and the local environment. No industrial or commercial storage facilities should be even considered in the green/agricultural environment in the immediate surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1548  **Respondent:** 15429697 / Robert Cairns  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the assessment used in the West Surrey Strategic Housing Market Assessment. for 517 house a year to be built in Guildford over a 20 year period from 2013 to 2033. The infrastructure in the town is already operating at capacity with congested roads, oversubscribed NHS services and capacity commuter services. I do not see how this need can be justified in the context of a public consultation. I would urge the council to reconsider this in the face of strong local opposition and extend the period of consultation to be both more inclusive and allow for due consideration of all interested and not just the narrow and vested political and commercial interests.

I took great pride in the council rejecting the proposed development at Guildford station and hope a similar level of pragmatism can be adopted in this interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the lack of Evidence supporting GBC Strategic Housing Market Assessment 2015 which is highly questionable and for which GBC has consistently refused to provide details of its calculations despite a petition and several requests to do so. I believe that the requirement for 13,860 new homes in the Borough is exaggerated. Even were the population to grow by 20,000, based on an average family size of 2.5 persons in each home, the need would only be for 8000 homes. It would appear that the number of temporary foreign students has been wrongly used to inflate the population need. The Green Belt does not need to be built over to meet that need, when 50% of the 13,860 new homes stated as needed, could be built on existing Brownfield Sites. GBC's Transport Assessment was not even been made available to Councillors when the vote on the New Local Plan was put to them on 25th May, which again questions the objectivity and competence of GBC and its Planners.

I OBJECT to the Lack of Evidence supporting the need for Industrial Development at Burnt Common. The latest Employment Land Needs Assessment (ELNA) in 2015 shows an 80% reduction in employment space need from the ELNA carried out by GBC in 2013. Bearing in mind the significant amount of vacant premises in the Borough and surrounding area, there is no need for new commercial and industrial development and the traffic and pollution problems that will ensue because of it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1 I OBJECT to the New Local Plan in principal, since it fails to achieve Guildford Borough Council's stated objective of "protecting the borough's most important countryside, landscapes and heritage". This New Plan fails to achieve any of these objectives in the case of Send Village in particular, whose History dates back past the Middle Ages and proposes development of 480 houses and 7,000 sq metres of industrial and warehousing space which will destroy Send's living environment; local countryside; areas of natural beauty; and cause harm to ancient woodlands - let alone a village community which has survived for hundreds of years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2907  Respondent: 15429985 / Jennifer Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 I OBJECT to the fact that POLICY A 43.30 ha is a NEW site not included in the Regulation 18 Draft and has NOT been consulted on previously. This is Green Belt land, permanently protected by the NPPF, which prevents the merging of settlements. There are no exceptional circumstances. It is a sensitive conservation site with ancient woodland and trees which have been there since the 16th Century and which would be irreparably damaged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3482  Respondent: 15429985 / Jennifer Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I OBJECT to POLICY A 43.30 ha LAND AT GARLICK'S ARCH Burnt Common for the building of 400 houses and 7,000 sq metres of industrial and warehousing.** If there was need for more industrial space, it could be developed more easily on the existing industrial site at Slyfield and no new 4-way A3 interchange would be needed in this environmentally sensitive area. There is photographic evidence of flooding on the site, making it unsuitable for housing. If this area was developed it would destroy the village communities of Send, Ripley and West Clandon and the quality of life and health of its residents and cause major problems in relation to Road Safety. There is no need for any more houses in this area, or even as many houses as the new Local Plan states are needed (13,860) - neither is there any need for the additional 7,000 sq metres of industrial and warehousing space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT to the NEW 4-WAY A3 Junction at Garlick's Arch, Burnt Common which is a NEW Site not included in the Regulation 18 Draft and NOT previously consulted upon.** This will drastically increase traffic volumes, particularly of commercial vehicles - the existing local road infrastructure cannot cope with the current volume: the subsequent increase in pollution will affect the Health and Quality of Life of local residents and wildlife: there would also be the loss of good quality agricultural land and inevitable damage to ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT to POLICY A 444.1.9 ha LAND WEST OF WINDS RIDGE AND SEND HILL which has designated the development of 40 homes and 2 Travellers' Pitches. This site is NEW and was NOT included in the Regulation 18 Draft and has not been consulted upon previously.** Development for housing is inappropriate due to its permanent Green Belt status and it is a Green Belt amenity within an area of natural beauty which would be totally destroyed by development. The site contains documented contaminated land which is vented. The site of the proposed Travellers' Pitches can only be accessed via a narrow single track country road, which makes access very limited and thus unsuitable for development.
I OBJECT that the already overloaded infrastructure and existing transport overload seems to have been completely ignored in the case of Send, as has the existing traffic congestion during peak times and in particular Send Barns Lane (A247) being used by large commercial vehicles, for which the road is totally unsuited. This is without the inevitable significant overload which will be caused by the proposed additional housing population and industrial development which is just not sustainable and will cause major traffic jams and significantly increased pollution for the existing population of Send. A Narrow Boat Marina and additional housing is already being developed in Tannery Lane, using a narrow road with a dangerous junction onto the A247 in the middle of Send Village. Send has already become a principal through route from Woking to the M25 and A3 and will become gridlocked all day - even without the proposed NEW 4-Way A3 Interchange. This alone could destroy the village and cause major Health and Safety problems, particularly in relation to the new development and merger of two schools which front onto Send Barns Lane (A247). There is already serious parking congestion and traffic problems with just the one current school. With the addition of the new second, congestion will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY P2 REMOVING SEND FROM THE GREEN BELT. Send is an historic settlement dating back many hundreds of years and provides an essential buffer between the large urban areas of Woking and Guildford. Send contains areas of Special Scientific Interest as well as areas of natural beauty and ancient woodlands: providing much needed habitats for wildlife and an amenity much enjoyed by Send residents as well as other GBC residents and clubs. Without the Green Belt to provide permanent protection afforded by the National Planning Policy Framework, Developers would have free rein and future development could not be stopped. Very quickly there would be no separation between
Woking and Guildford, as intended by Central Government in the NPPF, which is intended to prevent the merging of settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/525  Respondent: 15429985 / Jennifer Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new plan clearly demonstrates a lack of concern for Green Belt land and the residents of Send, who made thousands of objections to the 2016 Plan, all of which have been completely ignored in the latest Local Plan. An even greater number of houses have been proposed for the areas between and around Ripley and Send.

GBC appears oblivious to the loss of the Green Belt and the increase in pollution that will be caused by their proposed developments. GBC is ignoring the traffic and environmental problems which this Plan will cause - clearly totally uncaring for the health and safety of residents. GBC is deliberately ignoring the inadequate infrastructure of the area and are failing to place constraints, to take into account the lack of schools, medical facilities and roads, as is required by Law.

The assumption is that GBC and its Officers are placing commercial organisations and considerations over care for Residents and the areas of special scientific and historic interest contained in and around Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3820  Respondent: 15429985 / Jennifer Slade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery, Tannery Lane because the proposed housing has increased by 33% from 45 to 60 homes on a road with very restricted access: being effectively single lane in places. Tannery Lane is already used by many motorists as a cut through and is particularly dangerous in winter, as there are no street lights and no restriction on speed. There have already been hundreds of objections by Send residents to the inevitable increase in traffic on this road. This is also an area prone to serious surface water flooding, making it unsuitable for increased housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A43 change - Land at Garlick's Arch, Send Marsh because despite thousands of previous objections to development, it is now proposed that 400 homes and 6 Travelling Showpeople Plots are constructed. GBC has produced no evidence for any proven need for Showpeople Plots in this area, which is permanent Green Belt with no "exceptional circumstances". This area contains irreplaceable ancient woodland, dating back to Elizabeth I, which GBC is now proposing to destroy. It is currently a Flood Zone 2 allocation having frequent flooding and is a health risk for people and animals, being contaminated land with lead shot following 50 years of shooting activity. The proposed development will generate excessive traffic on roads that already get gridlocked in Send and Ripley at peak times and also remove the main area of green space between the villages of Ripley and Send, which is contrary to the purpose of the Green Belt.

I object to Policy A58 change - Land at Burnt Common, London Road which was deleted from the 2014 draft Plan, due to the large number of objections. There is no proven demand now or in the future for additional industrial capacity. It would therefore appear that GBC is presuming that a new A3 junction will be built sometime in the future at Send and justify this excessive industrial development within a Green Belt residential/rural area. The existing industrial areas in Slyfield and Guildford still have empty sites and industrial units and the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole of Guildford Borough - not the excessive allocation of 10 hectares in Send alone within the Green Belt which will cause major traffic gridlock in the surrounding roads and join up existing villages - again defeating the Green Belt. It is also noted that the word "maximum" in the 2016 Plan has, very significantly, been changed to "minimum". The existing roads cannot service such a development and the weight of commercial vehicles. This proposed industrial development on green belt is totally unacceptable and unnecessary.
### Comment ID: pslp171/1940  
**Respondent:** 15429985 / Jennifer Slade  
**Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2  

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ),  
**is Sound?** ( ),  
**is Legally Compliant?** ( )  

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Green Belt, Policy 2 at paragraph 4.3.15 - Send Business Park taken out of Green Belt because it is an old, non-conforming user in an area of countryside of outstanding natural beauty, which is also an area of special scientific interest adjacent to the Wey Navigation Canal. Tannery Lane has very restricted vehicular access in both directions; has major junction problems with the A247; is prone to flooding and any further development of this area is inappropriate - not least because it detracts from the openness and effectiveness of the Green Belt.

### Comment ID: PSLPA16/1552  
**Respondent:** 15430049 / Michael Armstrong  
**Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send  

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ),  
**is Sound?** ( ),  
**is Legally Compliant?** ( )  

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

My family and I have lived in Send Marsh for thirty-three years and enjoyed the benefits of a small community within the Green Belt. The services, transport and schooling area sustainable for the present population and allow the sense of identity for all those who live in Send, Send Marsh and Ripley.

The boroughs plans for new homes under represent draft plan is an enormous concern to us and many families in the green belt will cause the destruction of our rural village life and identity.

We greatly object to the Garlick’s Arch proposal, near to our home. The increase in housing, population and transport will have a strain on the present lifestyles and smooth running of services and especially transport to the A3 and M25.

Furthermore, there are more concerns to object to, which include: the buildings at clockbarn nursery; Send hill and the creation of a new interchange with the A3 at Burnt common.
The local councillors need to protect our greenbelt area and prevent the creation of a large conurbation which will be a failing for those living there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7369  Respondent: 15430049 / Michael Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Gosden Hill site at Clandon/Burpham with 2,200 homes will result in even worse traffic congestion at the A3, the traffic jam which occurs every day and regularly to Burnt Common will extend to Cobham and cause even further congestion at the M25 intersection. The regular traffic chaos which we encounter will be exacerbated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7367  Respondent: 15430049 / Michael Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the 2016 draft local plan.

I object to the disproportionate amount of development in the area, particularly to the Garlick Arch site at Burnt Common for at least 400 homes. The Portsmouth Road is already heavily laden with traffic and drivers often cut through this road in order to ‘short cut’ the jam on the A3 leading to the M25. The villages of Ripley, Wisley, Send, and Clandon are constantly affected by traffic when the main roads are jammed, a regular occurrence. How can the addition of 2,000 homes at the Wisley site be considered in view of traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7370  Respondent: 15430049 / Michael Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites with less than 2 weeks notice, leaving people very little time or no time at all to even address their concerns. Most people have hectic lives and this must be taken into consideration in local plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I have enjoyed and lived in Sendmarsh for over 30 years. The green belt is an aspect that has to be retained as it is such a valuable feature of the region and adds hugely to the well-being of commuters, it is such a relief for people to come home knowing there is the tranquillity of green belt that surrounds our villages.

During the last 2 decades there has been an enormous increase in traffic in the region, with the M25 and A3. On a daily basis when there is queuing traffic along the A3 at the various intersections, particularly at the junction of the M25: when there is an issue on either of these 2 main roads which are closely linked to the surrounding villages, traffic backs up very quickly having a detrimental effect on the journey of local people going about their daily business, such as going to school/work/hospitals etc.

I have outlined just a few of the concerns I have but have many other concerns too, which is why I feel very strongly against the plans to hugely increase housing and destroy the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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</table>
I object to the limited consultation period, especially as it is during a time when many people have organised their holidays etc.

I object to the last minute inclusion of new sites with less than 2 weeks notice, leaving people very little time or no time at all to even address their concerns. Most people have hectic lives and this must be taken into consideration in local plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1818  Respondent: 15430049 / Michael Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period, especially as it is during a time when many people have organised their holidays etc.

I object to the last minute inclusion of new sites with less than 2 weeks notice, leaving people very little time or no time at all to even address their concerns. Most people have hectic lives and this must be taken into consideration in local plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2121  Respondent: 15430049 / Michael Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period, especially as it is during a time when many people have organised their holidays etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1553  Respondent: 15430113 / N Cook  Agent:
What is very worrying is that the Housing assessment report was carried out by GL Hearn who are advisors to house builders, so this report can hardly be deemed credible and GL Hearn certainly have a conflict of interest. To date there is no credible evidence to demonstrate the need for 13,000 plus houses in the Borough and now the country has decided to Brexit, housing needs will change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/6367</th>
<th>Respondent: 15430113 / N Cook</th>
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<tr>
<td>The M25, A3, A247 and other local roads are busy roads with daily traffic jams occurring - the roads can not take anymore traffic. The infrastructure is not in place to facilitate any more houses.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object most strongly to Green Belt land being turned over for building purposes. I lived in the Clandons for 20 years and visit the area each day. My leisure and work involve use of the countryside within the Clandons and surrounding villages. Green Belt is land which should never be built on, so future generations are able to enjoy green open spaces.

Worryingly I see it is proposed that areas in East Clandon should be included in a settlement area and also I understand there is a proposal to extend the settlement area in West Clandon, both proposals I object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6375  Respondent: 15430113 / N Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to major large housing estates being built in an area prone to flooding. All proposals for flood relief within the Mid Thames zone have been scraped by the Government, so any additional house building will have a profound effect on flooding and just add to the misery it causes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6369  Respondent: 15430113 / N Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposed development at Garlick Arch, Wisley Airfield, Gosden Hill and Clandon Golf course. These large developments will have a profound effect on the Clandons and surrounding villages and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6371  Respondent: 15430241 / Tina Grace  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Most surveys conducted by parish council and local groups show a need and tolerance for no more than 50 - 100 new homes. Such a number could be slotted in around / within existing housing areas and if planned and executed sensitively, will have hopefully minimal impact on the character and practical functioning of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6370  Respondent: 15430241 / Tina Grace  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To increase a village population by over 30% without any thought to the additional strain placed on already strained local services, roads, schools/education, transport, drainage is misguided to say the least. The impact of 450 + new homes and the 900 additional cars that will add to the village roads, will seriously change the character of the village and will put local children who cycle or walking to school - something quite rightly encouraged by the local primary school- in a very position indeed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6372  Respondent: 15430241 / Tina Grace  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please reconsider your proposal for 450+ new homes in West Horsley and take a more measured approach in line with feedback expressed by the existing residents. The people of West Horsley are not being unreasonable. We understand that some increase in housing stock is need, as current residents wish to stay on in the village and new people wish to join our community. However, to increase the population of West Horsley by the numbers of people and cars you propose would destroy the character and effective functioning of the village for both existing and future residents.

I sincerely hope that you reconsider your proposal and that we can arrive at numbers which the West Horsley residents can embrace as a positive outcome for an organically evolving village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposed increase in household with no provision for General Health services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/1555</th>
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I object to the lack of clarity / support for the housing numbers included in the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposed A3 on / off slip at Burnt common, as a means of advancing large developments. This and the above site indicate a rather disingenuous responses at a public meeting with councillors held in Ripley.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to a specific policy re traveller pitches at the Paddocks, Rose Lane. The existing temporary permission has been ignored and the site is now over occupied, has brick structures and is an are for burning domestic and construction waste. This apparently cannot be monitored or enforced at the moment, so a legal extension would be unacceptable.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the lack of specific policy to ease an existing rural public transport crisis.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the degrading of the Greenbelt to a point when it’s very function is nullified.</td>
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<td>I object to the insetting / removing of villages from the Greenbelt. This seems to suggest that buildings and communities are not part of a Rural England.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the concentration of development in the North of the Borough, aimed at appeasing developers, maximising their profits and benefitting an overspill population from London. S2</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2969  Respondent: 15430369 / Sarah Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2963  Respondent: 15430369 / Sarah Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2936  Respondent: 15430369 / Sarah Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2951  Respondent: 15430369 / Sarah Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6400  Respondent: 15430369 / Sarah Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6423  Respondent: 15430369 / Sarah Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/2937  Respondent:  15430433 / Simon Greenhill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/2944  Respondent:  15430433 / Simon Greenhill  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/2958  Respondent:  15430433 / Simon Greenhill  Agent:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2972  **Respondent:** 15430497 / Martin Chalk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2966  **Respondent:** 15430497 / Martin Chalk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

**Comment ID:** PSLPS16/2939  **Respondent:** 15430497 / Martin Chalk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
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Attached documents:

Comment ID: PSLPS16/2954  Respondent: 15430497 / Martin Chalk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6404  Respondent: 15430497 / Martin Chalk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPP16/6428  Respondent: 15430497 / Martin Chalk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6394  **Respondent:** 15430497 / Martin Chalk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6419  **Respondent:** 15430497 / Martin Chalk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

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<td>You have not addressed any of the infrastructure improvements that will need to be put in place <strong>BEFORE</strong> any development begins; sewerage, water, power and road. There are major transport issues unresolved such as the need for a tunnel on the A3 to alleviate the major bottle neck that is Guildford. The positioning of the entrance for such a tunnel needs to be established <strong>BEFORE</strong> any housing uses up practical sites. If Hindhead can push for and get a tunnel then why hasn’t Guildford Council!</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPS16/2921</th>
<th>Respondent: 15430753 / Nick Wright</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Your Draft Plan is flawed because your proposed development of 2000 homes, offices and industrial sites, a park and ride with provision for 1000 cars, two schools and a railway station will just not physically fit onto Gosden Hill Farm.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
This plan provides too much land for development but not enough to ease congestion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLP16/6399  **Respondent:** 15430753 / Nick Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill Farm site is in the Green Belt and the 'National Planning Policy Framework' clearly states that any new Green Belts should only be established in exceptional circumstances. This Draft Plan does not show sufficient exceptional circumstances to justify its inclusion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1012  **Respondent:** 15430753 / Nick Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- It is seriously flawed and as such is unsound.

This plan is not yet ready for an inspector

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/2927  **Respondent:** 15430849 / Christopher Campbell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

---
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I draw your attention to the speech made by the new Prime Minister of the UK Theresa May in her inaugural speech where she said when questioned on fulfilling the need for more house building:

“I AM NOT TALKING ABOUT BUILDING IN THE GREEN BELT.
THE GREEN BELT IS VERY IMPORTANT”

Theresa May spoke further about the need to plan “MORE CLEVERLY”.

Building on the Green belt is not “Clever”, therefore:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt la Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see
both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1557  Respondent: 15430945 / Rosalind Molesworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I note the Traveller accommodation assessment was undertaken in June-July 2012 by Mill Field Services, however this company was dissolved in January 2011. More evidence that this proposal is not researched and developed in professional manner

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2930  Respondent: 15430945 / Rosalind Molesworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the statement under A43 that there is a stated opportunity that this will improve bus frequency and encourage travel to and from the site. It is hard to understand how the development of the number of houses proposed will in fact change the current occasional bus service to sufficiently reliable and frequent but service that can be relied upon for travel to and from employment.

I object under A43 the opportunity to reduce the flood risk. Any development will increase the risk both locally and in the area in general. All surface water drains to the Wey navigation which frequently overflows during periods of high rainfall and development put increased pressure on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to A44 the development of the area west of Send Hill Road which is not suitable to take increased traffic, it is not wide enough for two lanes of traffic as is evident by the lack of the middle white line. South of Send Hill is Potters lane which is already over used and is a frequent road with incidents where cars coming of the A3 cut through maintaining the speed they where traveling on the A3 and soon getting to the small number of houses and the blind corner where they meet an oncoming vehicle on a lane wide enough for a single car only. This is made worse in the winter months where the particular area is prone to flooding and the formation of ice frequently.

Further objection under A44 is that this is currently Green Belt and has an existing abundance of plant and wild life, this development will destroy this area with little or no regards to the eco system! The plan states “Green corridors and linkages to habitats outside of the site” where as in fact the plan removes the eco system habitats so hardly a linkage. The green belt beyond the site is predominantly farm land and not natural habitat.

I also object under A44 that requires “Sensitive design at site boundaries that has significant regard to the transition from village to greenfield” this only affects the boundary development whereas as the complete development will not be in keeping with the existing Village. As I personally have been rejected twice a conversion on my home for this very fact despite general support from the majority of my neighbours.

Under A44 there is a stated evidence of a quarry, but no mention that this was actually more recently used as a land fill, including the disposal of Asbestos! Therefore what precautions are taken into account for this? Development on a previous landfill should be considered very carefully. I understand that the area has been monitored recently and considered safe, however a major development would drastically affect this. The dumping here predates the 1999 EU landfall directive regulations.

Also the area under A44 one of the few areas locally for dog walking with access both via Send Hill and a foot path to the village, developing this will remove one of the few remaining places people within send can let their dog roam free.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/6421  Respondent: 15430945 / Rosalind Molesworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed plan affecting the Send and Send Marsh Areas:

I object to the local plan A44 as this would have an adverse impact on street parking.

Plans A42, A43 and A44: The village of Send and Send march have limited access, and no public transport which can be relied on for travel to employment. Therefore the creation of new homes within these areas will dramatically affect the already congested road network. It is noted that under the plan A43A there are new slip roads for the A3, and this is supported, however this will not by anyway relive the existing problem. The fact is during the rush hour periods and frequently on the weekends the A3 is congested from around the BP services to the M25. All new homes will still be served by the existing North bound slip at Ripley as it will take commuters closer to the M25. In fact it may encourage more of the existing A3 north bound traffic to travel through the over used village roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2935  Respondent: 15431073 / Roy Purves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy of retaining this land for Allotment use. In particular I am concerned with the Allotment in Guildford named Aldershot Road where I have been a plotholder for almost forty years and which has given me so much important exercise together with so much fresh vegetables. This I am sure has been the experience of all people so involved in this pursuit and it would be such an awful loss to the community if any plans in hand meant that any allotments would be lost! Apart from the personal loss there is the matter of loss of the green infrastructure of the area which must be kept to a minimum at all costs. In mentioning my allotment above, it has a serious local problem which I feel needs to be given specific consideration. Following on the area surrounding our lower vehicular access changing from being a car park, it appears that this access in now in jeopardy and all our plotholders are very worried about the alternative plan which has been mooted. Any such change would involve people coming to the plot having a long uphill walk to the old higher gate and there is the additional problem for car users finding parking space. Any such change must have serious thought before implementing. I do hope that everyone agrees with me that all plans involving allotments must be looked at with great care because the implications are widespread indeed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 15431105 / Philip Miller</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am philip miller I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], East Horsley. I strongly object to the plans to develop parts of our village. Please add me to the ‘No’ for the development. Thank you.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am writing to object in the strongest terms to the plan to remove the Villages of Send, Ockham, the Clandons and the Horsley’s from the Metropolitan Green Belt. Our parent's era devised the idea of this green belt in 1935 to stop the ongoing sprawl of London and other cities to give permanently open space, devoid of inappropriate development, and open air for everyone to enjoy. You only have to visit our villages every weekend to find the roads full of cyclists enjoying the countryside and fresh air. To change this policy will mean unethical developers will build on every scrap of land and we will become yet another London suburb -this must not happen.

Particular to Send, where we live, I object to the underhand planning application for Garlick’s Arch which came to light very late in the planning application process. Send itself already struggles to provide sufficient school places, doctors’ appointments, and bus services and the traffic is already at an unacceptable level at peak times. To add 400 more houses and an industrial area on this small wedge of green belt land is crazy and just greedy on the part of the landowners, who clearly have no conscience for the village and its needs.

I also object to the plans to build a new interchange onto the A3 at Burnt Common to take all the extra traffic going through our village from the proposed developments -not only at Garlick’s Arch but the proposals for Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm. Send Road and Send Barns Lane is already extremely congested and would become grid-locked.

Finally, I object to the renewed application for 2 travelers’ pitches at Send Hill. This road is extremely narrow and the surrounding countryside a favorite walking spot for many Send residents, let alone visitors to the cemetery [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1570  Respondent: 15432545 / M Petitt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to inform you that I wish to object to the proposal of Building Houses (593) in the Horsley’s, one of my main objections is to remove the Horsley’s from the Green Belt – Such a decision and action would be a disastrous act of stupidity because an increase of homes would mean an upheaval for most residents to the environment such a development would cause.

Village roads cannot cope at the best of times, let alone a further increase of traffic which in turn cause more pollution to this green village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2979  Respondent: 15432577 / J Morris  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object strongly to any development built on GREEN BELT At Gosden Hill Farm

Local plan draft is unsound:

Flawed Guildford Borough Council data was used to overestimate housing figures,

The SHMA figure of 693 pa is TOO HIGH

It has doubled from the figure given 4 years ago when the Brexit vote had not happened. It needs to be reduced in light of the reduced immigration in the future
It failed to correct historical errors, errors in student needs and errors in estimated homes needed to support job growth. Therefore the GBC needs to reduce this housing needs figure now after BREXIT. Instead they have refused to release their calculations. The report is unaccountable and therefore **THE LOCAL PLAN MUST BE CONSIDERED UNSOUND.**

An independent report commissioned by the guildford residents assoc, put the pre Brexit number at only 510 per year. This is also reducable in light of less immigration to Britain now we are out of EU.

The number of development of homes during the Plan period at 14000 is based on flawed and pre-Brexit data and is in any case unsustainable. It would result in massive overdevelopment. The destruction of the precious natural environment to disproportionately expand Burpham, with no constraints on the plan to protect the rural nature of the village would result in total loss of Send, Ripley, Wisley and Burpham's unique village identities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object because Wisley airfield is greenbelt land, there are plenty of brown belt sites that could be developed, it would be completely wrong to develop this area of outstanding natural beauty, it will be greatly detrimental to the wildlife there, the narrow rural lanes are not suitable for the large increase of traffic and the congestion it will cause and there will be an increase in air pollution, it will be shameful if Guildford borough council allow this development to go through for the reasons above and for the people living in the area, I don't live by the area but I go to the area often and know people in the area and it's shocking to think this lovely area could be destroyed by development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the Draft Local Plan for the following reasons.

(1) I object to the plan as the site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which already running over capacity.

(2) I object as the application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit, and there is no spare parking capacity at either of the local stations.

(3) I object because a site of this size are required to provide outdoor open space. The applicant has not complied with this requirement but rather has “double counted” the outdoor space with that required for SANGS.

(4) I object to the loss of high quality agricultural land is in contravention of policy.

(5) I object on the grounds of Air quality, the air quality figures are based on an unreliable transport assessment and therefore should not be used in evidence.

(6) I object as there is documentary evidence that the applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source)

(7) I object as a person who has COPD to the poor air quality which will be exacerbated in the area by such a development, Young and Old are extremely susceptible to poor air quality.

- It is clear that air quality is deteriorating largely due to the emissions from the traffic, I believe that the impact of poor air quality on the internationally famous RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area is already in excess of legal limits.

(8) I object because in my opinion the transport assessment makes a number of ridiculous assumptions and is not credible. It is completely unrealistic to assume that there will be a decrease in vehicle movements after completion of this development, and there will no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children living on site will have to be transported to the nearest available school in Leatherhead –
adding to congestion and pollution, and there will be no impact shown for the 270 daily bus movements which will impact local roads further, or for the waste lorries or HGV deliveries to the site.

The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.

(9) I object because the number of daily trips is understated in the region of 1000 vehicle movements. Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham, Ripley, and Downside and further afield. If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those planned by the RHS.

(10) I object because the site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the Special Protection Area and the M25 to the north and the Conservation area of Ockham Village to the south. Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances. The applicant has not demonstrated that exceptional circumstances exist.

(11) I object because the four and five storey buildings are not appropriate in the rural environment. Residents will be crammed in with little outdoor space, in a noisy location with very poor air quality.

(12) I object to the proposed closure of local road, coupled with the massive increases in traffic, will effect us & a large number of other road users from Cranleigh to Cobham and everywhere else in between. We regularly have to use Ockham Lane to avoid the chaos on the A3 when picking up our Grandchildren from school in Cobham.

Further, Ripley- The traffic data suggests fewer vehicles (15-28% less than today) on Portsmouth Road/High Street and Newark Lane. This information is flawed. We are daily subjected to queuing traffic on the Portsmouth Road, and as Senior citizens have given up in crossing this road to take our walk through to Polesden sailing club.

More traffic queuing in Ripley High Street will increase levels of NOx and NO2 pollution, possibly beyond EU limits.

- Additional traffic accessing the A3 will lead to longer journey times and additional driver stress. - The closure of Ockham Lane to vehicles will result in your separation from schools, doctors surgery etc. resulting in longer journey times and delay (via Old Lane/Forest Road or Old Lane/through the development, Ockham Road North to Horsley). More noise and dust pollution through the 12 year build resulting in loss of amenity- Loss of country footpaths and bridleways which become rights of way through a densely populated settlement.

- Traffic assessment does not include the A245 or Painshill junction despite the fact that it is likely that these roads will carry significant additional traffic.

We already have had to choose to curtail early appointments at the Village Surgery Send, because of the traffic build up at the Burmton Common Roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to removal of Brownfield site (A34) from the Plan**

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2276  **Respondent:** 15432705 / Gordon Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to removal of Brownfield sites (A4) from the Plan**

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2279  **Respondent:** 15432705 / Gordon Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to the extended development in the Green Belt (Policy P2, Site A43)**

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

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**I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch**
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2278  Respondent: 15432705 / Gordon Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2280  Respondent: 15432705 / Gordon Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2274  Respondent: 15432705 / Gordon Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2277  Respondent: 15432705 / Gordon Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

• The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm,… (site allocation A25) [ than the Burnt Common site did ]”
• The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are
almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/728  Respondent: 15432705 / Gordon Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit \( IS \) to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/726  Respondent: 15432705 / Gordon Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:
“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

The Garlich Arch, Burntcommon, Send & Wisley proposals will have a devastating affect on the quality of life, and pollution from the traffic it would generate, as all these developments will necessitate their traffic to be directed through Ripley, Ripley has already become a by pass for the A3, which on a daily basis has problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/727</th>
<th>Respondent: 15432705 / Gordon Bennett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/2984</th>
<th>Respondent: 15432801 / Frances Bennett</th>
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I Object to the Draft Local Plan for the following reasons.

(1) I object to the plan as the site is remote and occupants will rely on the use of the private motor car adding to traffic congestion on both the Strategic Route Network (the A3 and the M25) and local roads which already running over capacity.

(2) I object to the application relies on people switching to walking, cycling and public transport. This is unrealistic as it is two miles to the nearest railway station and at least half the route has no footpath. Roads are narrow and unlit, and there is no spare parking capacity at either of the local stations.

(3) I object because a site of this size are required to provide outdoor open space. The applicant has not complied with this requirement but rather has “double counted” the outdoor space with that required for SANGS.

(4) I object to the loss of high quality agricultural land is in contravention of policy.

(5) I object on the grounds of Air quality. The air quality figures are based on an unreliable transport assessment and therefore should not be used in evidence.

(6) I object as there is documentary evidence that the applicant has not used the DEFRA modelling statistics as required and rather appears used numbers from an unrecognised (and unreliable source).

(7) I object as a person who has COPD to the poor air quality which will be exacerbated in the area by such a development, Young and Old are extremely susceptible to poor air quality.

- It is clear that air quality is deteriorating largely due to the emissions from the traffic. I believe that the impact of poor air quality on the internationally famous RHS Gardens at Wisley and the Thames Basin Heath Special Protection Area is already in excess of legal limits.

(8) I object because in my opinion the transport assessment makes a number of ridiculous assumptions and is not credible. It is completely unrealistic to assume that there will be a decrease in vehicle movements after completion of this development, and there will no impact on traffic for the recently added secondary school, nor from the fact that prior to the school being built the children living on site will have to be transported to the nearest available school in Leatherhead – adding to congestion and pollution, and there will be no impact shown for the 270 daily bus movements which will impact local roads further, or for the waste lorries or HGV deliveries to the site.

The traffic counts bear no relation whatsoever with counts submitted to Guildford or to Woking borough councils in support of other large development projects.

(9) I object because the number of daily trips is understated in the region of 1000 vehicle movements. Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham, Ripley, and Downside and further afield. If allowed, the impact of the additional traffic may prohibit other developments further south on the A3 or indeed those planned by the RHS.

(10) I object because the site is in the Green Belt in a rural location, hemmed in by the A3 to the west, the Special Protection Area and the M25 to the north and the Conservation area of Ockham Village to the south. Green Belt boundaries can only be changed in the local plan process and in exceptional circumstances. The applicant has not demonstrated that exceptional circumstances exist.

(11) I object because the four and five storey buildings are not appropriate in the rural environment. Residents will be crammed in with little outdoor space, in a noisy location with very poor air quality.

(12) I object to the proposed closure of local road, coupled with the massive increases in traffic, will effect us & a large number of other road users from Cranleigh to Cobham and everywhere else in between. We regularly have to use Ockham Lane to avoid the chaos on the A3 when picking up our Grandchildren from school in Cobham.

Further, Ripley- The traffic data suggests fewer vehicles (15-28% less than today) on Portsmouth Road/High Street and Newark Lane. This information is flawed. We are daily subjected to queuing traffic on the Portsmouth Road, and as Senior citizens have given up in crossing this road to take our walk through to Polesden sailing club.
More traffic queuing in Ripley High Street will increase levels of NOx and NO2 pollution, possibly beyond EU limits.

- Additional traffic accessing the A3 will lead to longer journey times and additional driver stress.
- The closure of Ockham Lane to vehicles will result in your separation from schools, doctors surgery etc. resulting in longer journey times and delay (via Old Lane/Forest Road or Old Lane/through the development, Ockham Road North to Horsley)
- More noise and dust pollution through the 12 year build resulting in loss of amenity - Loss of country footpaths and bridleways which become rights of way through a densely populated settlement.

--- Traffic assessment does not include the A245 or Painshill junction despite the fact that it is likely that these roads will carry significant additional traffic.

We already have had to choose to curtail early appointments at the Village Surgery Send, because of the traffic build up at the Burntcommon Roundabout.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/2986  
Respondent: 15432897 / Michael Joule  
Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on so many levels, all have been well documented by others, but most particularly on the scant regard given by both Unis and SCC Highways in mitigating the impact of traffic increase on both A31 Hogs Back and the A3 by-pass. The University have consistently falsified their own projections on traffic increase and will continue to do so if this development goes ahead. Since the initial development of Manor Farm they have denied any increase in traffic above some minimal and notional percentage to Egerton Road, despite the recent vast redesign of the junction with Manor Farm and continuing increase in traffic volume since. With the addition of the Sports Centre, The Park and Ride and now the Veterinary Centre, Unis claim there has been no increase in traffic volume, how can they be believed on any future projections supporting their own development. Any future increases to this road system will have profound implications on the RSCH access and represents a significant danger in emergencies, all of which appear to be given scant regard in the pursuit of their own and GBC's financial gain. Why cannot they fulfil their own quota of accommodation build for which they already have planning consent? Or are they a special case to be treated differently from individuals or less influential bodies? I thought we lived in a democratic society.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/6456  
Respondent: 15432929 / Stephen Barnett  
Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object on so many levels, all have been well documented by others, but most particularly on the scant regard given by both Unis and SCC Highways in mitigating the impact of traffic increase on both A31 Hogs Back and the A3 by-pass. The University have consistently falsified their own projections on traffic increase and will continue to do so if this development goes ahead. Since the initial development of Manor Farm they have denied any increase in traffic above some minimal and notional percentage to Egerton Road, despite the recent vast redesign of the junction with Manor Farm and continuing increase in traffic volume since. With the addition of the Sports Centre, The Park and Ride and now the Veterinary Centre, Unis claim there has been no increase in traffic volume, how can they be believed on any future projections supporting their own development. Any future increases to this road system will have profound implications on the RSCH access and represents a significant danger in emergencies, all of which appear to be given scant regard in the pursuit of their own and GBC's financial gain. Why cannot they fulfil their own quota of accommodation build for which they already have planning consent? Or are they a special case to be treated differently from individuals or less influential bodies? I thought we lived in a democratic society.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to most strongly object to the removal of Chilworth, or ANY Surrey village, from the Green Belt under your proposed Local Plan.

We question why Surrey village and other residents should have their lives adversely affected and probably be exposed to those profiteering vandals known as property developers just because National Government has failed to implement/control any sensible immigration/population policy (despite promises!). The thinking is profoundly wrong. We should be actively controlling and reducing population (reducing demand) in this tiny island rather than insanely attempting to disproportionately increase housing (supply) to the detriment and discomfort of everyone, especially as we have no hope whatsoever of increasing adequate infrastructure.

We therefore ask you please, just for once, as our Council, to 'man-up' and actually support the wishes of your own electors and fellow Surrey residents and say 'NO' to National Government demands on this. Be a bit defiant for a change! Do you want Surrey covered in concrete? Don't you CARE?

With luck the EU Referendum result might ease the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/2987</th>
<th>Respondent: 15432993 / Hannah Moyvilan</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the policy for retention of allotment land at Aldershot site. This is very important for people with mental health issues, obesity, healthy living and encouragement children to take an interest in gardening. At Aldershot road site we have a school plot which got a gold medal in Guildford in bloom in 2015. There is a self-help group WASHA which helps families, elderly people and anyone who is struggling with their plot.

My grandchildren love going to the allotment to pick fruit and vegetables, also looking for wildlife, pond creatures, hedgehogs, slowworms and the green woodpecker. It is very important that we still have the lower vehicular access as it is quiet on dangerous walk around for children. I support Policy I4 (Green and Blue infrastructure) as it is enhancing biodiversity, allotment needs to be included in the list of green spaces in the definition of “green and blue infrastructure” in paragraph 4.6.31 of the draft plan (page 116)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to express my deep concern and anger over the recent new building proposals for Send.

I was saddened by and strongly object to Send being removed from Green Belt status. This will permanently alter the character of the village and will only open the way for yet more building development in the future. One of the main reasons we have chosen to live in Send is the fact it is surrounded by fields which gives it its rural status. With building on the Green Belt land our village feel and status will be irreversibly lost. Green Belt is exactly what it says it is and is there to protect the nature of places, provide open green spaces and enhance the lives of those that live there. Once lost, it is lost forever!

I am very concerned and strongly object to the way Guildford Borough Council have tried to 'sneak' these plans through without proper consultation. Significant changes legally require full consultation under Regulation 18. Since the last consultation major development proposals have been added to the plans and the council are obviously trying to quietly push them through. The 2014 proposal for 430 houses went down to 185 in April 2016. These have now gone up to 485! Every major site proposed for development in Send has been changed and a massive new road junction added on. I am disappointed in the council's approach which has been very underhanded and dishonest to the people of Send.

Send already struggles with the large amount of traffic driving through the village which often results in long queues and tail backs. The infrastructure will not be able to cope with all these new building proposals. You cannot just take a small village and dump hundreds of houses and large industrial developments onto it and expect it to work. There are not enough school places, it is already extremely difficult to get a doctor's appointment at the medical centre, the roads will be permanently grid locked and the status of village and village life will be gone forever. We do not wish to be an extension of Guildford but wish to remain a separate village with our own identity.

I strongly object to policy A43. 30ha Land at Garlick's Arch. There is no need for more houses on top of the 13,860 already proposed by the borough. It is Green Belt protected by the NPPF which prevents the merging of settlements. It is covered in ancient woodland with trees dating back to the 16th century and once lost, is lost forever. The latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Therefore the proposed industrial development of 7000sq m is not needed. The obvious place for any new industrial development is at Slyfield, Guildford - an industrial site already set up and running. There would then be no need to have to build a new 4-way interchange onto the A3 at Burnt Common to serve this industrial development. Surely saving money!

I was shocked by and strongly object to the policy A44. 1.9 HA Land West of Winds Ridge and Send Hill. This has been designated for 40 homes and 2 traveller's pitches. Where has this come from? It was NOT included in the regulation 18 draft and has NOT been previously consulted on. This is an area of unspoilt natural beauty and should not be destroyed. The subsoils documented as containing unsafe land fill waste which is currently vented, thereby making it unsuitable for development. Anyone visiting the village will be aware of the enormous volume of traffic it experiences daily especially during morning and evening rush hours and school drop off and collection times. The junction at the bottom of Send Hill already struggles to cope. Adding yet more houses and traveller pitches (with caravans) will make this junction impossible to cope and dangerous. Send Hill is a narrow width single track country road and certainly not built for so much extra daily traffic. Surely common sense dictates this is not a sensible idea.

Thank you for taking the time to read my concerns. Please do not allow Guildford Borough Council to 'sacrifice' the village status of Send with its beautiful surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I write to object to the Draft Local Plan (DLP) and in particular the proposals as they apply to East and West Horsley and the surrounding area.

I regularly visit my daughter and her family in East Horsley, and consider that the proposals for development and in relation to the road infrastructure in the area will have a significantly bad impact on traffic flow through, and access to the village. The roads are narrow and winding and already suffer from regular congestion, particularly if there has been an accident or breakdown on the M25 or A3.

The proposed new interchange at Burnt Common will simply encourage more vehicles to attempt to bypass any traffic jams by using the local roads. Such traffic is also likely to cause problems with speed and risk-taking, which increases the danger for pedestrians and cyclists, including children walking or cycling to and from school.

Additionally, the proposals in relation to the Wisley Airfield site and other local housing developments will add significantly to local road use, particularly at peak times. The DLP envisages some 533 new houses in the Horsleys, plus in excess of 2000 new houses on the Wisley site, the likelihood is that the majority of these new homes will be households running at least 2 vehicles. There are already difficulties at Effingham cross-roads, Effingham Junction and in getting into Cobham, all of which are regular routes for commuters and for the school run. The local roads are not capable of absorbing an addition 5000 or so vehicles without adding substantially to the delays and congestion in the area and decreasing the safety of all road users.

I object to changing the status of the land currently within the Metropolitan Green Belt. The National Planning Policy Framework (NPPF) requires that any change of Green Belt boundaries must demonstrate exceptional circumstances. No exceptional circumstances have been demonstrated within the DLP, and to change the status of current Green Belt land would change the character of the area for ever, to the considerable detriment of the Borough as a whole and the local communities.

Please take these points into account and reject the Draft Local Plan as inappropriate for the area. A new Draft should be put forward which properly takes these factors into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:
- It is effectively an old non-conforming user in an area of outstanding natural beauty which will be lost forever with consequent impacts on the quality of life of future generations
- There is highly restricted vehicular access along Tannery lane - in both directions
- Once again, it eliminates the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Specifically, I object to Policy A42 change at Clockbarn in Tannery Lane because:
- It will cause extreme congestion at the junction with the A247. Already, at certain times of the day during the working week the whole village is gridlocked. This proposal will only serve to exacerbate the problem
- It will remove greenbelt land which gives the village its 'village feel'
- It will damage open countryside views from the River Wey Navigation and create an eye sore
- It will risk increasing the likelihood of surface water flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Specifically, I object to Policy A42 change at Clockbarn in Tannery Lane because:
- It will cause extreme congestion at the junction with the A247. Already, at certain times of the day during the working week the whole village is gridlocked. This proposal will only serve to exacerbate the problem
- It will remove greenbelt land which gives the village its 'village feel'
- It will damage open countryside views from the River Wey Navigation and create an eye sore
- It will risk increasing the likelihood of surface water flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I also object to Policy A43 change at Garlick's Arch because:
• There is no proven demand for Travelling Showpeople plots in this location
• It will cause the village to be 'over-developed' with the consequent impact on local services such as schools and health services which are already stretched
• It will join up the villages of Ripley and Send into one ribbon development and so defeat the key purpose of having a Green Belt
• It is a flood zone 2 area
• It will cause excessive traffic which will increase air pollution and cause congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2721  Respondent: 15433153 / Helen Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:
• It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
• With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East
• The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send - and in the Green Belt
• Once again, the impact on congestion will be significant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6478  Respondent: 15433377 / Peter Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The infrastructure of the surrounding areas and potential plans to improve these is woefully unable to support an extra 593 houses in the Horsleys over the next 5 years and most particularly when you relate this 35% increase with proposals the 2000 houses at Wisley, the 400 houses at Burnt Common and the 2000 proposed for Burpham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6477  **Respondent:** 15433377 / Peter Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am appalled at the attempts to remove the Horsleys from the Green Belt as described within the document.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6476  **Respondent:** 15433377 / Peter Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There seems to be no justification for the size of the increase in the overall housing numbers detailed in the plan which are almost 70% above official national estimates for population growth in the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1013  **Respondent:** 15433377 / Peter Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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I am writing to express my concern over the recent new building proposals for *Send*

I strongly object to *Send* being removed from Green Belt status. This will permanently alter the character of the village and will only open the way for yet more building development in the future. With building on the Green Belt land, our village feel and status will be irreversibly lost. Green Belt is exactly what it says it is and is there to protect the nature of places, provide open green spaces and enhance the lives of those that live there.

I am very concerned and strongly object to the way Guildford Borough Council have tried to 'sneak' these plans through without proper consultation. Significant changes legally require full consultation under Regulation 18. Since the last consultation major development proposals have been added to the plans and the council are obviously trying to quietly push them through. The 2014 proposal for 430 houses went down to 185 in April 2016. These have now gone up to 485! Every major site proposed for development in *Send* has been changed and a massive new road junction added on. I am disappointed in the council's approach which has been very underhanded and dishonest to the people of *Send*.

*Send* already struggles with the large amount of traffic driving through the village which often results in long queues and tail backs. The infrastructure will not be able to cope with all these new build proposals. You cannot just take a small village and dump hundreds of houses and large industrial developments onto it and expect it to work. There are not enough school places, it is already extremely difficult to get a doctor's appointment at the medical centre, the roads will be permanently grid locked and the status of village and village life will be gone forever. We do not wish to be an extension of Guildford but wish to remain a separate village with our own identity.

I strongly object to policy A43.30ha Land at Garlick's Arch. There is no need for more houses on top of the 13,860 already proposed by the borough. It is Green Belt protected by the NPPF which prevents the merging of settlements. It is covered in ancient woodland with trees dating back to the 16th century and once lost, is lost forever. The latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Therefore the proposed industrial development of
7000sq m is not needed. The obvious place for any new industrial development is at Slyfield, Guildford - an industrial site already set up and running. There would then be no need to have to build a new 4-way interchange onto the A3 at Burnt Common to serve this industrial development and thus saving money!

I strongly object to the policy A44. 1.9 HA Land West of Winds Ridge and Send Hill. This has been designated for 40 homes and 2 traveler’s pitches. Where has this come from? It was NOT included in the regulation 18 draft and has NOT been previously consulted on. This is an area of unspoilt natural beauty and should not be destroyed. The subsoil is documented as containing unsafe land fill waste which is currently vented, thereby making it unsuitable for development. Anyone visiting the village will be aware of the enormous volume of traffic it experiences daily especially during morning and evening rush hours and school drop off and collection times. The junction at the bottom of Send Hill already struggles to cope.

Adding yet more houses and traveler pitches (with caravans) will make this junction impossible to cope and dangerous. Send Hill is a narrow width single track country road and certainly not built for so much extra daily traffic. Surely common sense dictates this is not a sensible idea.

Thank you for reading my concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2345  Respondent: 15433441 / Jacob Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically, I object to Policy A42 change at Clockbarn in Tannery Lane because:
• It will cause extreme congestion at the junction with the A247. Already, at certain times of the day during the working week the whole village is gridlocked. This proposal will only serve to exacerbate the problem
• It will remove greenbelt land which gives the village its 'village feel'
• It will damage open countryside views from the River Wey Navigation and create an eye sore
• It will risk increasing the likelihood of surface water flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2346  Respondent: 15433441 / Jacob Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 change at Garlick's Arch because:
- There is no proven demand for Travelling Showpeople plots in this location
- It will cause the village to be 'over-developed' with the consequent impact on local services such as schools and health services which are already stretched
- It will join up the villages of Ripley and Send into one ribbon development and so defeat the key purpose of having a Green Belt
- It is a flood zone 2 area
- It will cause excessive traffic which will increase air pollution and cause congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A58 at Burnt Common because:
- It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
- With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East
- The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send - and in the Gree Belt
- Once again, the impact on congestion will be significant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:
• It is effectively an old non-conforming user in an area of outstanding natural beauty which will be lost forever with consequent impacts on the quality of life of future generations
• There is highly restricted vehicular access along Tannery lane - in both directions
• Once again, it eliminates the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads, including Send.

I OBJECT to the fact that the Local Plan takes no account of Schools, Doctors surgeries and roads that are already operating at full capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A42 (building 45 houses at Clockbarn) because the roads are completely inadequate for the increase in traffic volume this will cause. Tannery Lane is a very narrow, windy, country road which has a hazardous junction for emerging traffic with Send Road. There is already planning permission for 64 houses and a new Marina which is going to generate too much heavy traffic as it is!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site and has not been consulted on previously. This is not only permanently protected Green Belt, but also a site of ancient woodland containing trees planted in the 16th century, and serving as a rich habitat for wildlife and plants. The industrial development of this site is completely unnecessary. There is a more appropriate site ready and available at Slyfield. There is also a history of flooding in this area.

I OBJECT to Policy A43.30 the development of a new four-way interchange onto the A3 which would mean that the narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already overcrowded and vulnerable to traffic jams and this proposal would be an utter disaster for Send and Ripley villages. Further traffic from this development would result in gridlocked roads. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, the new houses proposed at Wisley, and the new development proposed at Burpham – our roads cannot cope with this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A44 which would see 40 homes and two travellers’ pitches on land west of Winds Ridge and Send Hill. This is also a new site and therefore has not been consulted on previously. Once again this is precious Green Belt land, which also contains unsafe vented landfill. Access to this site is via a narrow lane, which could never take the increase in traffic which this development would create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6479  Respondent: 15433473 / Kay Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the 2016 Draft Local Plan by Guildford Borough Council (GBC) for the following reasons:

I OBJECT to the removal of Send from the Green Belt as the village provides a necessary ‘buffer’ between Woking and Guildford.

I OBJECT to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas, much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/347  Respondent: 15433473 / Kay Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the over development of my village and our insetting from the greenbelt. Send has been disproportionately allocated additional development in this submission even though the overall housing numbers have been reduced. It seems that as a village we raised the largest amount of objections, but GBC have ignored us and instead dumped even more housing/industrial development on us, which will result in us being even more gridlocked with traffic and pollution and our village losing its identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2624  Respondent: 15433473 / Kay Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn, Tannery Lane. The increase in the number of homes from 45 to 60 is too much. Tannery Lane is a narrow rural road which is heavily congested already and has access and traffic problems at the junction with the A247. There are also concerns about existing surface water flooding worsening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2625  Respondent: 15433473 / Kay Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43, Garlick’s Arch, Send Marsh; Despite 1000s of previous objections this site is still being proposed for development. This a site of ancient woodland and a beautiful area of green belt - no exceptional circumstances exist that should allow for this area to be built on. The increase in traffic from the 400 homes on its own will cause gridlock on our already overburdened roads, but in conjunction with other proposed sites in Send and the surrounding area is just madness.

I object to the allocation of 6 travelling showpeople sites in Policy A43, Garlick’s Arch. There is no proven demand for Travelling showpeople plots in this location, and combined with Policy A44 Winds Ridge, we will have a total of 8 of these plots - this is too much for our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to **Policy A58**, Land at Burntcommon, London Road. This was previously deleted from 2014 draft because of all previous objections made but has now been included again with a change in wording from ‘up to 7000sqm’ to ‘a minimum of 7000sqm. This potentially opens up this site to unlimited development (the site is over 90,000sqm) when there is no justification for industrial development in the borough, especially on green belt land. This site will also create even more traffic gridlock for Send

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park (Green Belt, policy 2, para 4.3.15) from the green belt as it is in a beautiful area of countryside next to the Wey navigation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons: 1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

- I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham (of which I am the Rector) and the blight on properties th The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walki The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

  6. The lack of suitable public The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 3th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this 1 Those reasons remain valid, and there are no adequate ways to overcome them.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6480  Respondent: 15433505 / Hugh Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being broken.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. It also fails to take into account the new situation due to Brexit, a factor which makes the draft Local Plan now appear hopelessly out of touch.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to the 2016 Draft Local Plan as it has no regard to schools required, additional medical or hospital facilities which would be necessary to make this plan sustainable.</td>
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<td>I object to the new site at Garlicks Arch being introduced as an after thought when it had been previously dismissed as unsustainable. I also object to the sites at Clock Barn Nursery, Tannery Lane and the land west of Wind Ridge being included.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England’s consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6482  Respondent: 15433569 / Jennifer Beddoes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate potential distribution of new houses across the Guildford Borough: the villages to the North East of Guildford are projected to take an unsustainable number of additional residents in a area where country lanes are narrow and the volume of traffic already using through routes already makes roads gridlocked during the rush hours. Your proposals do not show the effect on local roads - in particular the A247 and Potters Lane

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6483  Respondent: 15433569 / Jennifer Beddoes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a resident of Send Village and would like to express my concerns regarding the proposed development contained in the above plan.

I feel strongly that the development of villages is best achieved via the Neighbourhood Plan process which allows residents to determine an organic growth for any additional housing according to the needs of the village.

I therefore object to Guildford Borough Council determining the rise in the annual number of houses to be built each year: it would appear that the projected number of houses to be built has been overestimated by 30% which must surely be put down to financial gain rather than social need. This is a totally unrealistic number of houses for narrow country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In the Surrey Advertiser article, I believe the Earl of Onslow committed that he would undertake to provide a high quota of affordable housing and retirement homes if any development were allowed to proceed. In addition, he made a commitment to build a school to serve the new community. All these facilities and services are compelling and in high demand locally.

Another benefit of Clandon Park is the traffic and infrastructure in the area is strong as it was put in place to support a growth if traffic from the original development of the golf club. Sadly, something that never happened but the roads are at least in place. The other benefit to this site is the existing park and ride which is a fundamental advantage. It demonstrates that the site is excellently located for transport and also that the site has already been identified as suitable in principle for development.

From the review of the Local Plan some of the other sites would seem to have disadvantages and material infrastructure issues and are also prone to flooding. Surely the events of recent years and the devastation caused by floods in areas where development has proceeded without full consideration of the flood risk must teach us all lessons. My understanding is that the Clandon Park area is not a flood risk area.

Clandon Park (as described in the Surrey Advertiser) would be developed as a Village garden community and consistent with the aims and objectives outlined in important government policy. No other site meets these criteria. The need for a solution to the local housing shortage as soon as possible is another major advantage of the Clandon Park site. The sites mentioned in the local Plan all seem to have long lead times before development could start and further delays need to be avoided if possible. Moreover, it would seem to me that there are fundamental uncertainties attached to the development of the other large sites which might preclude material development. For instance, the refusal of the Wisley planning application states that there are still "fundamental" problems with the highways. It would seem to me from a cursory knowledge of Clandon Park that it has no "fundamental" problems and it would seem sensible for GBC to include the site for the certainty of deliverability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3030  Respondent: 15433633 / Mike Allcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A24 - SLYFIELD REGENERATION SITE

- This is a brownfield site and as such clearly from that point of view is a preferable site
- The previous use of the site (sewage and landfill) suggest material environmental issues which at the very least is likely to mean that there will be no development of this site in the next few years.

I hope that the Local Plan can proceed as soon as possible and that much needed affordable housing, specialist housing for the elderly and schools for our children can be developed. Having read the Surrey Advertiser article and hearing the commitments from the Earl of Onslow I feel Clandon Park Gold Club site would offer so much and the loss of a local golf course whilst disappointing is probably also inevitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3014</th>
<th>Respondent: 15433633 / Mike Allcock</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

### A25 GOSDEN HILL FARM

Transport and environmental issues would delay development. In particular:

- New juncture on A3 - expensive / disruptive / long lead time
- Provision of new railway station - expensive / very long lead time
- Other infrastructure issues - expensive / disruptive / long lead time
- There are flooding issues / draining issues
- Boundaries require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency
- There are tree preservation Orders in place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3020</th>
<th>Respondent: 15433633 / Mike Allcock</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

### A26 BLACKWELL FARM

Transport and environmental issues:

- Traffic: Significant traffic issues which bring into question the timing of commencement of development
- Rail: Requirement to contribute to network rail. I sense this can take many years to agree and implement
- *location: The location is not bordering to the town
- There are flooding issues / drainage issues
- Boundaries require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**A29 ASH AND TONINGHMAM**

* Village extension: The plan envisages a rather ad hoc village extension. Preservation of the integrity of villages is generally recognised as a paramount objective of the green belt and therefore including this site seems inappropriate. This is particularly so as the "site' actually consists of 8 separate sites

* Flooding and drainage issues are significant, and will require co-operation of adjoining land owners, that may not be forthcoming, and which are likely to delay the commencement of any development

* Boundaries require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency. Of course as there are 8 separate sites, there are 8 boundaries that need to be considered

* Rail - There is a requirement for a new road bridge and level crossing - again this will impact on the timing of the commencement of development

* Traffic - significant traffic issues, including roads between the 8 sites

* Ownership - The 8 sites are under "multiple ownership".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
A35 WISLEY

- Schooling: Highly questionable education plan which involves busing in children to secondary school - surely hugely undesirable from the point of view of children / parents / highways.
- Traffic - Fundamental problems (as detailed in the rejection of the planning application). At best, highway solutions will take many years to resolve and implement and any solution that is identified will be imperfect. It is quite plausible that no viable solution will be found. It seems unlikely that a proper and timely solution will be forthcoming.
- Buses - a significant bus network will be required to access railway and other transport links. All highly problematic: it will add to traffic on roads, many of which are already over congested. Developer is meant to fund costs going forward - how will this be secured?
- There are flooding / drainage issues.
- Boundaries require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency.
- There are noise and air quality issues.
- Part of site is allocated for waste use and it is not clear.
- The development of the site would lead to the loss of 13 hectares of "the Best and Most Versatile agricultural land.”
- There were 7 representations in favour of the One positive that was identified was that the development meant that village expansions would be avoided.
- There can be no certainty about whether the site can ever be developed and even on the best scenario commencement of development is certain to be many years hence. The location and sustainability of the site are both questionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/3029  Respondent:  15433633 / Mike Alcock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46 NORMANDY / FLEXFORD

- This is a village development / village extension and as such is inconsistent with national policy which favours leaving the integrity of villages intact. The universal opposition of the inclusion of this site from local villagers is entirely understandable.
- The boundaries will require sensitive design and are not consistent with government policy of ensuring that any boundary changes to the green belt will have a degree of permanency.
- There are flooding / drainage issues.
• Infrastructure issues - These will clearly take considerable time to resolve bringing into question the possible commencement date. In particular, the traffic increase through the local villages will be significant.

• Listed buildings and ancient wood lands complicate the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3005  Respondent: 15433665 / Andrew Holley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ockham. As someone who worked for 20 years in museums and the historic environment, I am particularly concerned about the threat posed by the Local Plan to the rural village of Ockham, which has many fine listed historic buildings including the Grade I listed All Saints Church. The Plan calls for a small village of 159 residences with a low level of public amenities to be subsumed into a development including over 2,000 dwellings. In addition, many of the proposed buildings are high density dwellings up to five stories high, making them completely inappropriate for a rural area such as Ockham and its environs.

I hope that these objections will be fully considered by the Council and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, will be removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3006  Respondent: 15433665 / Andrew Holley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Former Wisley Airfield/Three Farms Meadow. I believe that the FWA/TFM should not be removed from the Green Belt. The site should be protected in order to prevent further urban sprawl from London. It is also a valuable leisure resource for local people and visitors. The local wildlife also needs to be protected from development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6489  Respondent: 15433665 / Andrew Holley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to make the following objections to the draft Local Plan:

**Green Belt.** I am very concerned about a plan which proposes that over 70% of new housing be built within the Green Belt. Priority should be given to building on existing brownfield sites before encroaching on Green Belt land. As a resident of Hertfordshire, I am well aware of the threat posed by the destruction of the Green Belt around London and believe that this should be preserved wherever viable alternatives for development exist.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: SQLP16/1014  Respondent: 15433665 / Andrew Holley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadow (TFM) – Allocation A35 for the phased development of a new settlement of 2,068 dwellings

Although I am not a resident of Guildford Borough Council, I often visit my aunt and uncle in Ockham and enjoy the beautiful, unspoilt nature of the village and the surrounding area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Objections to the continued inclusion in the Guildford Borough Council Proposed Local Plan (June 2016) of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation 35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the inclusion of FWA/TFM in the draft Local Plan for the following key reasons: 1) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.

The site serves a vital role in protecting against urban sprawl from London.

Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. FWA/TFM is prime green belt, and was given to the country for an airfield as part of the war effort, based on the promise that the land would be returned to the community after the need for an airfield had passed. This promise has been broken, and no effort has been made to see whether there is a moral or equitable duty to return this land to the existing community.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley’s (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties theret. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

2. The increased volume of car traffic proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation. In particular, two schools should not be planned in the FWA/TFM area which is known to have poor air quality, which will only be exacerbated by the planned development.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Those reasons remain valid, and there are no adequate ways to overcome them.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6513  Respondent: 15433697 / Beniah Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016)

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being broken.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. It also fails to take into account the new situation due to Brexit, a factor which makes the draft Local Plan now appear hopelessly out of date.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5165  Respondent: 15433697 / Beniah Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OVERESTIMATED HOUSING LEVELS BY GBC

The Plan is Flawed from the building of this SEVERELY OVERESTIMATED housing, of 693 houses by the SHMA, DOUBLE the figure given 4 years ago, and now due to BREXIT this figure needs to be massively reduced and no doubt will be. The number of immigrants needing housing has reduced due to Britain leaving the EU. I believe the GBC local plan should take the public's wishes in the Brexit vote to reduce the number of houses as Waverley Borough Council did, but they gave an OVERestimate of what housing needs will be. This is not acceptable to the residents of Burpham whose lives will be ruined by the dumping of unnecessary development all in one place on our beautiful country surroundings. The GBC have refused to release how the estimate has been calculated - their report is unaccountable and therefore should be considered unsound.

This Disproportionate Level of Development Is USUSTAINABLE. The unique identities of Send, Ripley and Burpham will be lost, and the wildlife of the countryside separating the villages in the Green Belt should have overriding priority over the greed and corruption of the Property company Martin Grant. The GBC planners who obviously do NOT put the needs and views of the people they were paid and elected to represent first, nor the legacy of the RURAL FARMING land we wish to leave to future generations UNSPOILED, not an urban sprawl of new low income housing estates and around 10-100 travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3043  Respondent: 15433793 / Jennifer Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Councils housing estimate needs are flawed and should be massively reduced in the way Woking and Waverley council has applied constraints to overall Housing growth.

Especially in light of Brexit the figures for housing needs now need to be recalculated before this unnecessary development of 2000 houses at Gosden Hill goes ahead, destroying the GREEN BELT. The local peoples desire or the communities necessity for a low income and traveller site estate on the Green Belt is absolutely zero.

The National Planning policy Framework states that:

The essential characteristics of Green Belts are their openness and their permanence.

The Local Plan does NOT give sufficient evidence of exceptional circumstances to justify allocating Green Belt land at Gosden Hill, an ancient forest with massive importance to conservation of wildlife, and local residents and future generations pollution, noise and quality of environment for unnecessary development.

Instead more consideration can be given to brownfield regeneration, homes in the town centre instead of retail which is becoming less needed as internet shopping takes over for most people. More Student housing can be built on campus, it is not needed out in the countryside many miles from the University.

The proposed 2000 houses dumped on Gosden Hill would have a devastating effect on Burpham and must be thrown out. A Park and Ride for 1000 cars, 2 schools - unfunded by govt plans, and a train station also not planned for in Wessex railway.
plans are going to put an atrocious level of congestion and pollution all on the area of Burpham. Clay Lane is proposed in the plan as the only way for 3000 cars from Gosden Hill Site to access the A3 northbound. Putting this level of traffic through Burphams already busy centre would be fundamentally flawed and the only solution would be a 4 way intersection at Potters Lane A3.

This, along with the Tunnel to ease traffic congestion in Guildford are not on the plan.

A decision on the tunnel is needed before Gosden Hill can be earmarked for housing development.

The council used flawed data, an unsatisfactory consultation period, and lack of evidence for alleged housing needs in the future therefore the local plan is UNSOUND and must be refused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6521  Respondent: 15433793 / Jennifer Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this the most on the grounds that the natural surroundings that I live in and have existed in the ancient woodland at Gosden Hill would be destroyed forever by greedy developers who have NO regard for the lives of deer, birds, myriad other animals who live in the hedgerows that they want to kill. The green space to the immediate rear of my house would be destroyed and turned into an urban sprawl joining Guildford to West Clandon, with total loss of wildlife in an unimaginable slaughter by traffic on the roads.

[Summary of redacted paragraph: Objection to 2000 houses and facilities for 9 traveller sites - it would be detrimental to the area; and the proposal has the potential to increase tension between the traveller and non-traveller community which would result in social, economic and environmental impacts]

The traffic alone that would have to come through the village to rejoin the A3, would cause pollution to rise over 30%...causing huge damage to the health of residents, many of them elderly and children of Merrow Lane and Gosden Hill Road. The damage to the environment would be irreversible and extreme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1024  Respondent: 15433793 / Jennifer Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Guildford borough Council’s draft Local Plan June 2016 on the grounds that it is unsustainable and based on unsound data; insufficient consulting periods and flawed data have been used to come up with the Local plan, it is therefore UNSOUND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/6524</th>
<th>Respondent: 15433825 / Mary Howard</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Expansion should be limited, to protect the character of our gap town and surrounding countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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We need more homes in the centre for workers, students and especially the elderly; we do not need more shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<p>| Comment ID: PSLPP16/6525 | Respondent: 15433825 / Mary Howard | Agent: |</p>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>More homes would lead to more traffic and even more congestion in the town centre.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I oppose any unjustified green belt development.</td>
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<td>Brownfield opportunities here are being ignored.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I support the GRA response to the local plan, and strongly oppose the expansion of Guildford by a quarter.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/1588</th>
<th>Respondent: 15434081 / S Williams</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to Send Village being removed from the Green Belt

As I understand the Green Belt was always intended to be kept as such to provide a division between Villages, towns etc.

- I object to the building of 45 houses at Clockbarn Nursery. Tannery Lane has an exceptionally narrow and winding road, in places only room for one car and if you meet a lorry there is no room for maneuver. Also a very hazardous junction coming from Tannery lane to join the Send Road, the sight vision is dreadful with parked cars either side of the junction onto the main road.
- I object to the building of 400 houses and an Industrial space at Garlick’s Arch. This site in particular is covered with woodland and pasture and certainly never intended for building purposes. The site floods dreadfully, water coming off the A3 into the stream which then floods the fields. We have photographic proof of this as it is Cobham Sporting Gun Club site and has been for the best part of 30 years and floods often. The Industrial proposal should be sited at Slyfield which would be ideal to extend and keep in one place.
- I object to the development of 40 houses and 2 pitches on Send Hill called the Paddocks. Again access to this site is very narrow especially from the Cemetery down to Potters Lane where that junction is often a cause for concern the way the traffic speeds along Potters Lane and again an inappropriate place for houses and travelers site.
- I object to a new interchange with the A3 at Burnt Common very The traffic now if there is a problem on the M25 or A3 is horrendous through the villages of Ripley, Send Marsh and Send and we become grid locked with traffic finding alternative routes out of the congestion. The roads are not capable of taking on all the extra volume of large lorry’s, which is what would happen. We had to have an Air Ambulance land on Send Marsh Green last week for an accident and part of our road was closed diverting bus and large vehicles around the Green causing havoc, we cannot support all this extra traffic, its spoiling our lovely English Villages here in Surrey.

Let’s not ruin our lovely countryside when there are a lot of Brown Sites to consider first … WE DONT WANT TO BE JOINED TO GUILDFORD / WOKING etc.

What consideration has been taken for Dr’s, Schools, Colleges, Transport
Leisure etc.?
All these things require a car, bus, train, coach which again add to the volume of traffic at rush hours

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8633  Respondent: 15434145 / Christine Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt in any of the designated areas, including Wisley Airfield, Burnt Common and in Send.

I object to the proposed number of new houses in an area where residents experience traffic congestion every single day, where I have to drive my husband to the station at Effingham Junction as there are no parking spaces for his car by the time he leaves after 9.30am, where it already takes two or three days before a doctor's appointment is available in East Horsley, and the Waitrose car park in Cobham already has a daily queue for entry which blocks the approach road. Cobham, Ockham, the Horsleys and Ripley are already at capacity for the road and support infrastructure.

In the meantime if we choose to go to Guildford to support the Farmer's Market the traffic getting in and out is painful. Last weekend I had to complete my weekend meat order by calling in at the butcher's in Bramley. The A281 back to Guildford was solid so I went via Godalming and there was a roadworks diversion on the Charterhouse road. I sat in traffic for an hour trying to get home to Cobham. Compton was at a standstill. There are already too many people here!

I have lived in Ockham for 37 years and the quality of life has diminished here in that time along with the air quality due to the increase in traffic jams on the A3. Your local plan does not make life better for the residents who have been paying GBC Council Taxes for many years - we get less for more money.

In the meantime Guildford Town centre has great capacity for residential development in the hideous and dirty car parks around the cinema for example. I went there when the cinema in Esher was being refurbished and had the worst cinematic evening out in my life. To have a drink before the film we crossed a three lane road to the nearest hostelry on an earsplitting roundabout, and the pub floor literally squelched with spilt alcohol and stank. I was embarrassed to have brought foreign guests to the "City" of Guildford which seemed as poor and shabby as a Third World country. North Street is like Belfast in the 1970's. Spend our money on smartening up your town before you concrete over our Green Belt!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6553  Respondent: 15434145 / Christine Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I object to the proposed number of new houses in an area where residents experience traffic congestion every single day, where I have to drive my husband to the station at Effingham Junction as there are no parking spaces for his car by the time he leaves after 9.30am, where it already takes two or three days before a doctor’s appointment is available in East Horsley, and the Waitrose car park in Cobham already has a daily queue for entry which blocks the approach road. Cobham, Ockham, the Horsleys and Ripley are already at capacity for the road and support infrastructure.

In the meantime if we choose to go to Guildford to support the Farmer’s Market the traffic getting in and out is painful. Last weekend I had to complete my weekend meat order by calling in at the butcher’s in Bramley. The A281 back to Guildford was solid so I went via Godalming and there was a roadworks diversion on the Charterhouse road. I sat in traffic for an hour trying to get home to Cobham. Compton was at a standstill. There are already too many people here!

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3041 Respondent: 15434177 / June Newell Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The roads are small, narrow and unclassified and as such the plans for a large scale development would result in a road system that would be unable to cope.
2. The area is known for flooding and sewage problems and as a result these facilities would be unable to cope.
3. There is a large selection of local secondary schools, many that are under subscribed that would render any planned secondary school as unnecessary.
4. The area is an historic green belt area and a large scale development would spoil this for future generations.
5. The village of Normandy provides us with a true village feel that would be lost with a development of this size.

I hope you will consider my objections to the proposal at A46 on the draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3042 Respondent: 15434209 / Brian David Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The impact of over 2000 houses in the Wisley/Ockham area would have a huge impact on the Horsleys. Just 2 miles away and with a local railway station with easy access to London raises unimaginable, additional, traffic problems in an already very congested village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is already under great strain. The schools are full and medical facilities are sorely stretched. The volume of traffic is extremely heavy and way beyond what a rural village shround be expected to bear. The roads are totally inadequate for the volume of traffic and numbers of heavy lorries which use the B2037. Existing pavements are too narrow and pedestrians are constantly at risk from vehicles which are far too big for the local roads or from vehicles which travel much too fast through the Horsleys. There is little or no scope for expansion of the current infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Brownfield sites have not been properly developed.

No sound reasons have been provided for the proposed changes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6559  Respondent: 15434209 / Brian David  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inflated number of new houses would result in an alarming increase in in the number of Horsley residents way [an estimated 35%] in an area with an already overstretched infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1595  Respondent: 15434241 / Valerie Sowerby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1596  Respondent: 15434241 / Valerie Sowerby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable. Why is this so?

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The development will generate in the region of 6,000 vehicles which will pour onto the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15434241 / Valerie Sowerby</th>
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OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3052  Respondent: 15434241 / Valerie Sowerby  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6571  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6568  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6569  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6570  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6582  **Respondent:** 15434241 / Valerie Sowerby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6578  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to (POLICY H1 – Homes for all). Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim to be necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6580  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6573  **Respondent:** 15434241 / Valerie Sowerby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision for the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion development will cause to the trunk roads A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ or the land to be taken from the Green Belt. Once taken the green belt is lost forever!!

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6562  Respondent: 15434241 / Valerie Sowerby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1  I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and why were Councillors not allowed to scrutinise it? The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clendon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on but there is no schedule for Garlick’s Arch (A43), so the Plan does not take no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The SHMA report more than doubles the figure of 322 used in previous plans.

This figure cannot be verified because the council will not publish the SHMA report. There is a lack of transparency which is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3048  Respondent: 15434273 / Brian Crosby  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is currently protected from development as Green Belt.

The Plan states the preference is to use of previously developed land, but

GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch, however, the Plan’s preference states that previously developed land should be considered first.

There are no planned increases in schools or Doctor’s surgeries.

The local secondary schools are already too full for local residents to gain access to – our children’s allocated school was a 40 minute bus ride away which is why I ended up paying for private education!

It is already virtually impossible to get an appointment at our local Doctor’s surgery in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3049  Respondent: 15434273 / Brian Crosby  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43) since there is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed but that site was removed from the Plan without any reasoning.

Developing Garlick’s Arch would cause the loss of 4 local rural businesses which are successful.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which are clearly sustainable since they have been for there decades employing local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3047  Respondent: 15434273 / Brian Crosby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

On/Off ramps for the A3 at Burnt Common will result in a huge additional traffic burden on all the associated villages by providing access to Woking and Dorking/leatherhead via Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6567  Respondent: 15434273 / Brian Crosby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our roads are narrow and congested already. More traffic will result in more congestion and render the villages and surrounding areas less safe as a consequence
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6581  Respondent: 15434273 / Brian Crosby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done.

The M25 at J10 is blocked virtually every day already but the Highways England includes no measures to improve it before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6575  Respondent: 15434273 / Brian Crosby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

The major developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and greater levels of air pollution, thereby having a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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1. **I object to not protecting the Green Belt (Policy P2)**

Removing Ripley, Send and Clandon from the Green Belt will inevitably result in developments filling in all available spaces between the villages, destroying green belt and resulting in a similar urban sprawl to that created by Woking and its nearby villages all eventually merging into one urban development. The National Planning Policy gives no exceptional circumstances for these villages to be removed.

The Plan should develop the existing **brownfield** site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/6561</th>
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**Objections to Guildford Borough Proposed Submission Local Plan (June 2016)**

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) for the following reasons:

1. **I object to the Local Plan as the development proposed is not sustainable (Policy S1)**

I believe that the number of houses proposed will result in a massive increase in car numbers which will be too much for Ripley, Send and Clandon to absorb. Already the villages are busy at peak times. Ripley and Send do not have Railway stations and bus routes are infrequent so cars are the obvious means of transport for new residents.

I see no plans to improve the infrastructure in the Garlick’s Arch development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/6572</th>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough with too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]).

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will result in urbanisation and an inevitable merging of the current the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1592  Respondent: 15434305 / Antonia Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed Guildford Borough Council Local Plan application, with the proposal to remove Green Belt status from the villages of Send and Ripley in order to build residential and industrial sites (elements A42, A43 and A44), for the reasons stated below.

I object, as the road network in Send and Ripley, centred on the A247, is barely adequate for the current population of these villages; it is already frequently congested during rush hour. Any population growth or industrial expansion in the area will inevitably result in an increase of traffic, particularly heavy vehicles, which will not only bring congestion to the network, but also increase pollution and noise levels, which will adversely affect the health of those who have chosen to live in a peaceful, environmentally friendly environment.

I object, to the proposed removal of Send Village from the Green Belt. The Green Belt has always been intended to be permanent, this is a requirement stated by the National Planning Policy Framework, and no special circumstances can justify abandoning this requirement now. Send's Green Belt is an essential buffer, preventing urban sprawl and stopping Woking and Guildford becoming one conurbation. There is a very clear commitment from Local councilors and central government to protect the Green Belt and this reneges upon this guarantee.

Developers will be quick to take advantage and the Villages of Send and Ripley will lose their heritage and traditions.

I object, to the proposal to build 400 houses and 7000 sq. metres of industrial space at Garlick's Arch (Policy A43), opposite Send Marsh road. This site is covered by ancient woodland; industrial sites will destroy this forever. The extra industrial space, if required, could be added to the current industrial area in Slyfield, as adding to this industrial area would
have much less impact. As Guildford's housing requirements have been shown to be grossly exaggerated with a refusal to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

I object, to the development of 40 houses and 2 travelers’ pitches on Send Hill, opposite Send Cemetery. The narrow country road does not provide sufficient access, making this an inappropriate location to develop. The subsoil of the proposed site contains documented unsafe landfill waste, as registered with Guildford Borough Council. Guildford Borough Council has already installed gas monitoring wells on the site, since July 2000; one well recorded methane gas discharge. An environmental report by Wasteland Solutions, from March 2004, found evidence of past ponding of water in the excavated area, so any development could disturb the water table and increase the risk of flooding to nearby properties, including my home. As this area is already suffering from congestion, particularly at school times, the proposed number of houses will potentially result on an increase of unnecessary traffic, pollution and noise. Any type of development would spoil an area of natural beauty, resulting in the destruction of a valuable and irreplaceable natural habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3087  Respondent: 15434305 / Antonia Phillips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed Guildford Borough Council Local Plan application, with the proposal to remove Green Belt status from the villages of Send and Ripley in order to build residential and industrial sites (elements A42, A43 and A44), for the reasons stated below.

I object, as the road network in Send and Ripley, centred on the A247, is barely adequate for the current population of these villages; it is already frequently congested during rush hour. Any population growth or industrial expansion in the area will inevitably result in an increase of traffic, particularly heavy vehicles, which will not only bring congestion to the network, but also increase pollution and noise levels, which will adversely affect the health of those who have chosen to live in a peaceful, environmentally friendly environment.

I object, to the proposed removal of Send Village from the Green Belt. The Green Belt has always been intended to be permanent, this is a requirement stated by the National Planning Policy Framework, and no special circumstances can justify abandoning this requirement now. Send’s Green Belt is an essential buffer, preventing urban sprawl and stopping Woking and Guildford becoming one conurbation. There is a very clear commitment from Local councillors and central government to protect the Green Belt and this reneges upon this guarantee. Developers will be quick to take advantage and the Villages of Send and Ripley will lose their heritage and traditions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6194  Respondent: 15434305 / Antonia Phillips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the proposal to build 400 houses and 7000 sq. metres of industrial space at Garlick’s Arch (Policy A43), opposite Send Marsh road. This site is covered by ancient woodland; industrial sites will destroy this forever. The extra industrial space, if required, could be added to the current industrial area in Slyfield, as adding to this industrial area would have much less impact. As Guildford’s housing requirements have been shown to be grossly exaggerated with a refusal to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/6197   Respondent: 15434305 / Antonia Phillips   Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object, to the development of 40 houses and 2 travellers’ pitches on Send Hill, opposite Send Cemetery. The narrow country road does not provide sufficient access, making this an inappropriate location to develop. The subsoil of the proposed site contains documented unsafe landfill waste, as registered with Guildford Borough Council. Guildford Borough Council has already installed gas monitoring wells on the site, since July 2000; one well recorded methane gas discharge. An environmental report by Wasteland Solutions, from March 2004, found evidence of past ponding of water in the excavated area, so any development could disturb the water table and increase the risk of flooding to nearby properties, including my home. As this area is already suffering from congestion, particularly at school times, the proposed number of houses will potentially result on an increase of unnecessary traffic, pollution and noise. Any type of development would spoil an area of natural beauty, resulting in the destruction of a valuable and irreplaceable natural habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6583   Respondent: 15434401 / Margaret Warner   Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object strongly to the G.B.C. proposed new local plan.

Whilst I appreciate that there is a need for some development there is also a need to protect East Horsley village. The greenbelt is vital for this and any "exceptional circumstances" need to be clearly explained and demonstrated which is not the case. P2

Also, the area cannot cope with a new development at Wisley. Already, the roads are, at times gridlocked, the schools are full and cannot expand, the medical facilities are stretched and the shops and parking are barely adequate now and as for air quality and drainage they would only worsen.

The former Wisley Airfield should NOT be on the draft local plan and I strongly object that, after it has been thrown out by the Guildford Council, that it is still included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3055</th>
<th>Respondent: 15434433 / James Collins</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6590  **Respondent:** 15434433 / James Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6585  **Respondent:** 15434433 / James Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td><strong>I object to removal of Brownfield site (A34) from the Plan</strong></td>
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<td>Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td><strong>I object to removal of Brownfield sites (A4) from the Plan</strong></td>
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<tr>
<td>Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1553  Respondent: 15434433 / James Collins  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1557  Respondent: 15434433 / James Collins  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch.

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”
Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1561</th>
<th>Respondent: 15434433 / James Collins</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>pslp171/396</th>
<th>Respondent: 15434433 / James Collins</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site."

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
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<tr>
<th>Comment ID: pslp171/397</th>
<th>Respondent: 15434433 / James Collins</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| Attached documents: |

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/398  Respondent: 15434433 / James Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6584  Respondent: 15434465 / E N Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Guildford Borough Council, in its new Local Plan, proposing to remove Green Belt protection from a number of villages in the Guildford area. This includes 'insetting' (i.e. removing from the Green Belt), the village of Chilworth along with the villages of Shalford, Peasmarsh and others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3056  Respondent: 15434529 / Kate lloyd  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The impact of over 2000 houses in the Wisley/Ockham area would have a huge impact on the Horsleys which are just 2 miles away and with a local railway station with easy access to London the prospect of such a large addition to the population raises unimaginable, additional, traffic problems in an already very congested village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6591  Respondent: 15434529 / Kate lloyd  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is already under great strain.
The schools are full and medical facilities are sorely stretched.
The volume of traffic is extremely heavy and way beyond what a rural village shroud be expected to bear.
The roads are totally inadequate for the volume of traffic and numbers of heavy lorries which use the B2037.
Existing pavements are too narrow and pedestrians are constantly at risk from vehicles which are far too big for the local roads or from vehicles which travel much too fast through the Horsleys.
There is little or no scope for expansion of the current infrastructure
I object to the removal of the Horsleys from the green belt and the proposed developments on the following grounds:

Brownfield sites have not been properly developed.

No sound reasons have been provided for the proposed changes.

I object to the removal of the Horsleys from the green belt and the proposed developments on the following grounds:

Brownfield sites have not been properly developed.

No sound reasons have been provided for the proposed changes.

The inflated number of new houses would result in an alarming increase in the number of Horsley residents, an estimated 35% in an area with an already overstretched infrastructure.

I sincerely hope my objections will be duly noted.

I object to the removal of the Horsleys from the green belt and the proposed developments on the following grounds:

Brownfield sites have not been properly developed.

No sound reasons have been provided for the proposed changes.

The inflated number of new houses would result in an alarming increase in the number of Horsley residents, an estimated 35% in an area with an already overstretched infrastructure.

I sincerely hope my objections will be duly noted.
We object to Guildford Borough Councils draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hogs Back at Blackwell Farm which will: • destroy views from the Hogs Back ridge - a nationally designated Area of Outstanding Natural Beauty.

- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt.
- increase tailbacks on the A31 and traffic congestion.
- result in rat running through local roads.
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6595  Respondent: 15434593 / Eric Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in West Horsley for 41 years and over that period have noticed how the area has become more crowded, this has been caused by infilling with houses resulting in car parking becoming more difficult, both Horsley and Effingham station car parks are usually full. The local schools are full. The doctors surgeries are full. The foul sewerage system cannot cope with anymore buildings in the area without upgrading which is not currently planned.

Please do not overcrowd this beautiful area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6594  Respondent: 15434593 / Eric Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
THE GREEN BELT should never be built on, not for nothing is it called the lung for London, with pollution coming from Heathrow Airport, the M25 motorway and London it is needed more than ever. If the building of houses, offices and roads is ever allowed there will always be an excuse to build more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6597  Respondent: 15434721 / Charlotte Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With the large number of houses envisaged (Gosden Hill Farm - Merrow policy A25 and Garlick's Arch policy A43) the infrastructure to cope with all the new houses will never be delivered.

Volume of cars will clog the already overcrowded roads in this area for which there is no solution and will just make travelling around our borough a misery

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6599  Respondent: 15434721 / Charlotte Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common is already a very busy traffic crossroads and any new slip roads to new housing developments will feed more through and local traffic through a already congested area.

Our area, despite it being in or near Green Belt, is already grinding to a halt most of the day with traffic and the M25 which would bring people into the area does not function as a motorway any more with gridlock for 90% of the time and more traffic coming to the area will only add to the misery

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6601  Respondent:  15434721 / Charlotte Jordan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt and its environs are a treasured area for people to 'live well, breath and relax' and all these proposals of Housing and Light Industry will take this away forever and contravenes the Governments commitment for Green Belt protection and the people living in it.

Thank you for listening to my objections and reasons why the lovely area we all live in must not be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1599  Respondent:  15434753 / Hilary Clements  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to the policies which will directly affect me and my family.

These are namely Ash & Tongham (Policies A27, A28 and A29)

and

Normandy (Policy A46)

My address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], so I am right in between these 2 areas of development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3060  Respondent:  15434753 / Hilary Clements  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Lastly in respect of Policy A46 there is nothing in the local plan which gives any evidence of 'exceptional circumstances' to justify the release of site A46 from the Green Belt. So why does there need to be development in this area instead of other locations around the borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6604  
Recipient: 15434753 / Hilary Clements  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

The reason we moved to this area was due to the Green Belt area, and these additional homes will virtually make one large new town between Aldershot and Guildford. I don't believe sufficient plans have been made for infrastructure to support this increase, not only for traffic but also for vital services such as doctors and hospital. Local surgeries are already under strain with waiting times of up to 2 weeks for non urgent appointments, this can only get worse. Issues with being able to park in Ash Vale to shop already demonstrate how quickly a trouble free trip to the shops can become a nightmare as it has been impossible to park on some occasions since the opening of the Co Op in place of Budgens, there will be far greater requirements for this type of shopping, and no plans for appropriate additional shops or parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My objection is on the grounds that traffic in the area (particularly along the A323) is already bad particularly in rush hour, and an increase by more than 2400 houses will only worsen this congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1600  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing
Construction on the Green Belt may not be necessary at all now that housing needs have fallen because of Britain’s imminent departure from the EU.

The council has estimated incorrectly based on flawed data- the SHMA figure has doubled from 4 years ago, and it is wrong on several counts, it fails to correct historical errors, it fails to account for immigration from EU falling to zero after the BREXIT, it is flawed in the way student needs are considered and estimations in job growth post Brexit.

Waverley and Woking Borough Councils are sensibly applying REDUCTIONS to the proposed levels of housing growth, and so must Guildford Borough Council, BEFORE the earmarking of GREEN BELT countryside for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3228  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As GBC did not properly account for how the reports figures were arrived at, and too short a period of consultation was given the Draft Local plan is unaccountable and therefore UNSOUND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I very strongly object to the Draft Local Plan June 2016

It is unsound for many reasons but the main objection I have is to the inclusion a travellers site on Green Belt Land at Gosden Hill Farm.

The infrastructure provision for building 2000 houses here is clearly unsustainable and would ruin the village of Burpham, as well as destroying the unique and important separate identities of the villages surrounding the area, West Clandon, Send and Ripley.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it.]

[Summary of redacted paragraph: Objection to the proposal for 9 traveller pitches at Gosden Hill Farm on the basis that: it would be detrimental to the area; Burpham is already an attractive area for the gypsy traveller community without the provision of further sites; and the proposal has the potential to increase tension between the traveller and non-traveller community which would result in social, economic and environmental impacts, as seen at other traveller sites in in Egerton Road, Bannisters Field, Worpleston, Compton and Woking.]

The 30% rise in transport polluting Burpham were the Draft Local Plan to bring about the unnecessary development of Green Belt at Gosden Hill Farm would seem like nothing compared to the actual rubbish tip the travellers would no doubt dump in our gardens, roadsides, green spaces and hedges. The Common Land along Merrow Lane and the beautiful ancient woodland adjacent to the proposed traveller site would quickly and irrevocably be damaged, polluted and become a rubbish tip.

If Guildford Borough Council were to allow this plan to develop Gosden Hill Low income housing estates on Green Belt countryside they would be diminishing the property values of local homeowners, and quality of life of all the residents of Burpham, West Clandon and Merrow to hell. Policy requiring local authorities to plan to meet the housing needs of gypsies and travellers should be axed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No exceptional circumstances to allow Unnecessary Development have been shown by Borough Council to warrant the 200 house and traveller sites being built on Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6608  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Retail
Retail Space is planned at 40% growth, clearly going against trends in retailing and internet shopping, and Post Brexit economy influences. This is clearly UNSOUND planning. The need for less traffic in the already congested town centre should be given priority over more development. There will be less need for the proposed 1000 car park and ride, not more. Any needed development should be done on BROWNFIELD sites that will no doubt appear in town as the retail sector reduces, NOT on pristine country rural Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6607  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport-
the following needs are unsupported in the plan:

Evidence of future traffic conditions which is in the SHAR has not been finished and has been provided too late for the PLAN to respond to.

The proposed Sustainable Movement Corridor is unsound, due to narrow roads and pinch points. At Burpham the London Road is supposed to carry 2 bus/cycle lanes north and south bound as well as 2 general traffic lanes each way. This will result in the Gosden Hill development, the 1000 car park and ride, 2 schools and railway station as well as unspecified retail and business traffic proposed to start as early as 2021 delivering massive traffic to London Road/new inn lane junction before the proposed A3 improvements in 2023-2027.
The tunnel, railway station etc issues need to be decided before the building of 2000 houses on the site where the 4 way junction of A3 is planned to go

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6606  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Local Plan proposal to build on GREEN BELT

Top priority should be given to SAVING THE GREEN BELT.

The "EXCEPTIONAL CIRCUMSTANCES" under which Green Belt can be developed have NOT been evidenced by GBC, using the flawed data they have come up with in the Draft 2016 Local Plan.

The destruction of rural land is unnecessary and National Policy attaches greater importance on conserving this precious natural resource for wildlife, free from development and pollution that the plan would bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13296  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the UNSUSTAINABLE, based on FLAWED DATA draft Local plan june 2016

I support the Guildfords Residents Association response and am opposed to Guildford expanding by a quarter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1603  Respondent: 15434881 / M G Waugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I disagree with the Council’s housing projection of a need for 693 houses per year (identified in the SHMA) for the period 2013-2033 when an independent report prepared by NMSS for Guildford Resident’s Association in June 2016 identifies that the Objectively Assessed Housing Need is nearer to 510. This reinforces my view that the statistical basis for the draft Local Plan is fundamentally flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1602  Respondent: 15434881 / M G Waugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys and is completely out of keeping with their village status. The proposal to build 180 houses in East Horsley and 411 in West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6617  Respondent: 15434881 / M G Waugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to work. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council's Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6616  Respondent: 15434881 / M G Waugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and we have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

2. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally flawed. The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere else. Surely by interfering with the flood plain at the site doesn’t become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6610  Respondent: 15434881 / M G Waugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have “urbanisation” implications far beyond those envisaged by the mantra that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

1. I object to your proposal to remove the Horsleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

2. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportunities. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6618  Respondent: 15434881  M G Waugh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Council’s failure to unlock the development potential of brownfield sites in the Borough and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3066  Respondent: 15434913  Margaret Amos  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to:

1) I refer to site A46 in your proposal to build 1100 homes on land that has not been removed from the Metropolitan Green Belt, and exceptional circumstances have not been demonstrated or approved.

2) There are approximately 3,000 resident in Normandy, and the majority of them wish for Normandy to remain a village with the sense of community that brings. We have no need for a secondary school, as both Ash Manor and Kings College, which serve this parish are under subscribed and have room for expansion as and when neccessary. Surely the residents needs and priorities come first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3069</th>
<th>Respondent: 15434913 / Margaret Amos</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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I also object on the grounds of destruction of the wildlife that live along side is in this area (A46). I have an allotment on Westwood Lane, and know from experience that there are little owls nesting in an oak tree next door, and on walks along the nearby public footpaths, I have seen grass snakes and adders, hedgehogs. toads and slow worms as well as a great variety of butterflies including the small tortoise shell, which is becoming rare. Any large development would destroy all of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/3075</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is a proposed development for 350 homes to be built at Fairlands- Rokers land with land given for provision of a secondary school there. So why build a school at Normandy? There is simply no need.

And lastly, I object on the grounds that everyone on of us needs wide open spaces, trees, woods and hedges, some peaceful place, and clean air to breathe. So, Normandy can and does provide this, for not just the residents, but also nearby by towns, especially as places like Ash and Tongham which are becoming more and more urbanised. It is often reported in the press by the medical profession that stress levels are immediately lowered by a visit to a peaceful quiet country area, (such as Normandy) so the heath benefits are essential. We do not want to become part of the urban sprawl planned by Guildford Borough council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads and other transport infrastructure required to support your proposals would create a completely unacceptable impact on the present highways, and together with other neighbouring plans for enormous developments, would cause catastrophic chaos to commuters and others in and out of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flooding at site A46 has always been an issue in the area, which alone makes it completely unsustainable. Even given the best drainage and sewage systems in the place, all that water had to go somewhere, so its common sense to assume that more residents will experience sewage back-ups and other health issues, and some people else where will will have flooded homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/1316  Respondent: 15434913 / Margaret Amos  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I’m writing regards certain issues outlined in the GBC local plan 2017. Removal of the site A46 for 1,100 homes and a school, I fully support, as the impact on the infrastructure and the greatness of so much development would be overwhelming for our roads, water supplies and flood, electricity, gas and the doctors surgery.

Normandy is a small village community and we value our way of life, and the open spaces, woodland, trees and fields, and the wildlife we share these spaces with.

I do object to your proposal to remove certain areas from the protection of the Green Belt, as this measure usually means allowing an insidious growth of development to occur, which again will have an enormous impact on our roads etc. as things are at present, Westwood Lane, and Guildford Road, and Glaziers Lane are under pressure from surrounding houses, development and high density of traffic.

The cost of all these proposals is not just a monetary one, it’s the cost to our health and well-being as well.

Please reconsider removing the Green Belt status from parts of Guildford Road, Glaziers Lane, Flexford, Walden Cottages, and Palm Hous Nurseries Traveller site, as proposed in your local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6665  Respondent: 15435361 / A Hanes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
What are we leaving for a future generation? An urban sprawl, no breathing space and further congestion?

Already we have an infrastructure that cannot cope i.e. Schools, roads, hospital

Move houses in Green Belt means more concrete areas affecting water table, more pollution (air and light) A devastating effect on nature and wildlife. Surely Green Belt was meant to protect all this!

There must be many areas better suited to development, brown sites and military non used land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object about the draft plans to develop a huge number of houses plus an industrial park on the site of Blackwell Farm on the Hogs Back. Views from the Hogs Back, an AONB, will be destroyed and a large area of farmland will be lost. In addition, extra traffic that such a development would be bound to create, would cause increased traffic queues on the A31, a road already blighted with very lengthy tailbacks especially at peak times.

Sirs, I beg you to reconsider, and reject, this truly unacceptable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3073  Respondent: 15435937 / John Millward  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings" We live in Cobham and therefore close to the old Wisley Airfield. Because of that proximity, we are more affected by developments at Wisley than residents in many other parts of Guildford Borough.

We are very concerned that the Guildford Local Plan proposes to remove Wisley Airfield from the green belt and permit the building of numerous houses on it because:

- It is an important green buffer to prevent the spread of urban sprawl southwards.
- The immediate area consists of very small hamlets connected by narrow lanes. Adding thousands of houses on the airfield site would totally change the area from rural to semi-urban.
- Roads connecting to any of the local railway stations are narrow and have no pavements, it would be dangerous to cycle or walk along them, meaning that cars would be used which would dramatically increase the traffic in these lanes.
- Connection to the trunk roads of the A3 and M25 can only be via the roundabout at the North end of Ripley which is already a seriously difficult access going north. Going South would have to pass through the village of Ripley which is already congested at busy times.
- Air quality is already poor here because of the proximity to the A3/M25 junction. Major development here and especially the increase in traffic would make it worse.
- There is much wildlife on the site and surrounding area, some of it endangered, it would be seriously impacted by a major development at this site

Guildford Borough Council recently rejected planning application 15/P/00012 for two thousand houses on this site for the above reasons and the resultant report spells them out.

Please amend the plan to keep Wisley Airfield as part of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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- Connection to the trunk roads of the A3 and M25 can only be via the roundabout at the North end of Ripley which is already a seriously difficult access going north. Going South would have to pass through the village of Ripley which is already congested at busy times.
- Air quality is already poor here because of the proximity to the A3/M25 junction. Major development here and especially the increase in traffic would make it worse.
- There is much wildlife on the site and surrounding area, some of it endangered, it would be seriously impacted by a major development at this site.

Guildford Borough Council recently rejected planning application 15/P/00012 for two thousand houses on this site for the above reasons and the resultant report spells them out.

Please amend the plan to keep Wisley Airfield as part of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was appalled to learn that Guildford Borough Council are proposing under their new Local Plan to remove Chilworth, Shalford and Peasmarsh from the existing Green Belt.

As a resident of Chilworth, I am concerned that a village based in an area of outstanding natural beauty (the Surrey Hills) should be removed from Green Belt listing, which will then allow for unfettered development. This area is popular with ramblers, nature lovers and those just wishing to enjoy the peace and quiet of the Surrey Hills. To remove its Green Belt protected status could open it up to mass development, which will then destroy the very qualities which make it such a charming area attracting visitors from all over the country.

Hence, I wish to raise the strongest of objections to the Council's proposal to remove Chilworth and the other local villages from Green Belt protection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3076</th>
<th>Respondent: 15436065 / Victor Smith</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Regarding: 'The Local Plan’

I request that my comments below be seen by the planning Inspector:

I OBJECT to the building of 400 houses and 7000 square metres of industrial space at Garlick’s Arch Burnt Common for the following reasons:

1. My property in Manor Road, Send Marsh where I have lived for 45 years is now classed as being in a flood plain area. This was narrowly spared from flooding in the late 1960s. I feel that the development of the area known as Garlicks Arch will greatly increase the risk of flooding in Send Marsh village which includes my property. The Send stream which boarders the rear of my property carries surface and flood water. Although flood protection improvements were made several years ago in Send Marsh Road, the level of the stream on some occasions can be very high during heavy rainfall. Consequently I am greatly concerned of the risk posed by further surface drainage water running off of a large development / concreted area.

1. Due to traffic at peak times of the day, the junction of Send Marsh Road with the Portsmouth Road can be both difficult and dangerous. Further traffic in this immediate vicinity will greatly increase this already present problem.

1. I cannot understand why Guilford Borough Council wish to deplete the Green Belt within its boundaries instead of prioritising existing brown field sites. The character of this borough is strengthened by having individual villages such as Send and Send Marsh which enhance the beauty of the this part of Surrey. I therefore strongly object to Send Marsh / Send losing its Green Belt Status. Local councillors together with central government gave a promise to protect the Green Belt. Therefore you as a council should uphold this pledge.
I OBJECT to a new interchange with the A3 at Burnt common because of the increase in local traffic including from the proposed 2000 new houses at Wisley Airfield. Additional local traffic would affect the already busy Portsmouth Road and particularly Send Road which is often at gridlock already during peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3078  Respondent: 15436129 / Mark Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fields are available to help people to have access to healthy open spaces - this is helpful in terms of children’s development and mental health improvement for people of all ages.  

The proposed plan is too large and should concentrate on Brown Field sites such as the Wisley Airfield at Ockham which is a concrete/tarmac jungle with noise from the A3. This could be made into a proper village with facilities for families, single people, the elderly and social housing and also a traveller site. Unlike the plan for the rest of the villages where landowners will not take into account with developers on enhancing people’s lives.

Some development is necessary but not in this scale and taking over the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6680  Respondent: 15436129 / Mark Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no plan for improving an already overburdened infrastructure. There are problems with drainage, access to GPS, the schools are overburdened and the roads are in a terrible condition.

Fields are available to help people to have access to healthy open spaces - this is helpful in terms of children’s development and mental health improvement for people of all ages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/6679  Respondent: 15436129 / Mark Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the plans for the Horsleys.

There are no exceptional circumstances to remove the Horsleys from the Green Belt.

The extension of boundaries of the Settlement area is not linked to any advantage to the community or the borough but is just to ultimately lose the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3079  Respondent: 15436353 / Diana Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 400 houses and 7000 square metres of industrial space at Garlick’s Arch Burnt Common for the following reasons:

1. My property in Manor Road, Send Marsh where I have lived for 45 years is now classed as being in a flood plain area. This was narrowly spared from flooding in the late 1960s. I feel that the development of the area known as Garlicks Arch will greatly increase the risk of flooding in Send Marsh village which includes my property. The Send stream which boarders the rear of my property carries surface and flood water. Although flood protection improvements were made several years ago in Send Marsh Road, the level of the stream on some occasions can be very high during heavy rainfall. Consequently I am greatly concerned of the risk posed by further surface drainage water running off of a large development / concreted area.
1. Due to traffic at peak times of the day, the junction of Send Marsh Road with the Portsmouth Road can be both difficult and dangerous. Further traffic in this immediate vicinity will greatly increase this already present problem.

I cannot understand why Guilford Borough Council wish to deplete the Green Belt within its boundaries instead of prioritising existing brown field sites. The character of this borough is strengthened by having individual villages such as Send and Send Marsh which enhance the beauty of this part of Surrey. I therefore strongly object to Send Marsh / Send losing its Green Belt Status. Local councillors together with central government gave a promise to protect the Green Belt. Therefore you as a council should uphold this pledge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3080  Respondent: 15436353 / Diana Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because of the increase in local traffic including from the proposed 2000 new houses at Wisley Airfield. Additional local traffic would affect the already busy Portsmouth Road and particularly Send Road which is often at gridlock already during peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3083  Respondent: 15436801 / Simon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 400 houses and 7000 square metres of industrial space at Garlick’s Arch Burnt Common for the following reasons:

1. My parents property where I live is in Manor Road, Send Marsh is now classed as being in a flood plain area. This was narrowly spared from flooding in the late 1960s. I feel that the development of the area known as Garlicks Arch will greatly increase the risk of flooding in Send Marsh village which includes my parents property where I live. The Send stream which boarders the rear of my property carries surface and flood water. Although
flood protection improvements were made several years ago in Send Marsh Road, the level of the stream on some occasions can be very high during heavy rainfall. Consequently I am greatly concerned of the risk posed by further surface drainage water running off of a large development/concreted area.

1. Due to traffic at peak times of the day, the junction of Send Marsh Road with the Portsmouth Road can be both difficult and dangerous. Further traffic in this immediate vicinity will greatly increase this already present problem.

I cannot understand why Guilford Borough Council wish to deplete the Green Belt within its boundaries instead of prioritising existing brown field sites. The character of this borough is strengthened by having individual villages such as Send and Send Marsh which enhance the beauty of this part of Surrey. I therefore strongly object to Send Marsh/Send losing its Green Belt Status. Local councillors together with central government gave a promise to protect the Green Belt. Therefore you as a council should uphold this pledge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3081  Respondent: 15436801 / Simon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3090  Respondent: 15436961 / Barbara Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object very strongly to the revised draft local plan to develop in the Ockham/Horsleys area. The impact of siting a new residential development of over 2000 households at Ockham so close to the villages of East and West Horsley would be tremendous, the extra traffic alone on the local roads is inconceivable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6688  **Respondent:** 15436961 / Barbara Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed increase in the number of residences in the villages of Ockham, East and West Horsley is totally out of keeping with the local environment and I object very strongly to this local development plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6687  **Respondent:** 15436961 / Barbara Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The village of West Horsley is essentially a semi-rural parish of varied size and design homes with few areas of high density housing. The proposed plan to build so many new homes in such density will put so much extra strain on services and resources in the village. Already drainage is overstretched and several areas are regularly flooded.

Parking will be further overstretched particularly at the local station, where it is often impossible to find a parking space, and the village shops. The local schools are already at saturation point and the taking and collecting of more children by car will exacerbate an existing problem of traffic flow.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6686  **Respondent:** 15436961 / Barbara Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>I also object strongly to the plan to inset, and thereby remove the villages of East and West Horsley from the Green Belt, a dangerous precedent which may well allow future development within the villages. The rural nature of the area attracting great numbers of visitors including walkers, cyclists and campers enjoying this well known area of Surrey.</td>
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<td>45 houses at Clockbarn Nursery in Tannery Lane - I know and have driven this lane on numerous occasions and object to this proposal. It is ludicrous given that you can only fit one car down the lane and it is very narrow! The roads just do not support the level of increased traffic, the proposal will be hazardous to the public and environment.</td>
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<td>400 houses &amp; 7000 sq m industrial space at Garlick's Arch - I again object due to the paramount negative impact it would have on the environment, infrastructure and services of Send. Not to mention the pollution</td>
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Comment ID: PSLPS16/3094  Respondent: 15437089 / Jamie Manester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A new interchange with the A3 at Burnt Common - I object to this proposal as the increase in traffic would be devastating to Send. Send is already overloaded with traffic and is already frequently gridlocked! An increase in volume of traffic would have an adverse effect on the environment from air and noise pollution, resulting in poorer quality of life!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3093  Respondent: 15437089 / Jamie Manester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

40 houses & 2 traveller pitches - again, I object! It is absurd given that Send Hill Road is totally unsuitable; there is not sufficient access, it's already unable to support increased traffic levels. Increased pollution would be detrimental to the residents and environment (not to mention the much needed peaceful ambience of the cemetery), safety to residents would be comprised, and the negative impact to services like the local school and doctors would be significant, need I say more!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6690  Respondent: 15437089 / Jamie Manester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Removal of Send Village from the Green Belt - I object as I thought there was a permanent Green Belt protection in place for Send. There is no justification for this. I am concerned for the adverse impact on the area if agreed to as developers will plan to build out, this will result in significant pressure on local services, infrastructure & the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1612  Respondent: 15437217 / P.J. Henderson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my objection to aspects of the local plan effecting the villages of Send and Ripley. My first objection is to the removal of the green belt status of the villages. I have lived at the above address for over 35 years and the area has gradually improved throughout that time. The idea of removing either of these villages from the Green Belt, currently before the planning committee, would be little short of vandalism. The dividing line between Send and Old Woking is already and extremely thin one. The dividing line between Send and West Clandon (the A3) is already virtually non-existent. If new building is allowed to fill the little green belt that remains then yet another urban sprawl will be the result and the people who, like my family, moved out of London to enjoy the green fields of 'leafy' Surrey will be cheated out of the life style they bought into and have paid the premium for.

My second objection is to any large housing development in the area such as the proposal for 400 new houses at the Garlick's Arch site on Burnt Common. Over the years I have witnessed the growing strain on the infrastructure of the two villages. Int he last few years finding a parking space in each has become progressively more difficult. Clearly any significant increase in the local population will completely overload this capacity. This will also put unacceptable strain on the provision of local school places and doctor's surgeries. I do not have any objection to small developments that local services can cope with.

I am, of course, well aware of the national housing shortage and the problems specific to London (successive politicians have done little to be proud of on that score in the last forty years). However, building too many houses in this area will not solve that problem -they will be too expensive for the people who really need accommodation to afford. What is needed are more 'new towns', where the infrastructure can be designed appropriately. What is not needed is the destruction of the nation’s village heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1611  Respondent: 15437313 / Sarah Gooden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford
We are writing to object to Guildford Borough Council's Draft Local Plan. We believe Normandy is unsuited to the sort of expansion proposed. We are particularly concerned by the high levels of development proposed which completely disregard Green Belt protection.

It is clear that GBC has taken no account of one of the major purposes of the Green Belt which is the prevention of urban sprawl. It is important that the rural farming village of Normandy retains its green belt status. No account has been taken by GBC of the concept of "openness" and yet this is one of the main purposes of Green Belt, as evidenced by the Planning Inspectorate in recent appeal decisions (indicating they recognise that land contained in Normandy contributes to the openness of Green Belt).

NEW SECONDARY SCHOOL

We object to the proposal for the 1100 housing development on Land parcel A46 because there is no proven need for a new Secondary School. And without a school there is no need for the associated development plan.

Currently neighbouring Secondary Schools - Kings College and Park Barn - are under-utilised (the latter by 57%). The Head Teachers of Ash Manor School and Kings College have expressed a willingness to expand once they are full. They have the facilities to do this. Secondary Schools to the west of the Borough are under subscribed by 736. Another 480 places will be available at the new Technical Collage (2018) and there are approved expansions at Guildford County School and St Peters. The new Hoe Valley School will have 120 places available per year, 25 places this year not taken (no catchment area). Developments in teaching and learning (independent learning) mean that Secondary Schools could become obsolete in the near future. In addition there is a falling birth rate in Guildford.

Surrey County Council has failed to prove an undisputed need for a 7 Form Entry Secondary School as well as the availability of financing this to make it a reality.

With No Proven Need there can be -

No New Secondary School and Therefore No Housing Development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
ENVIRONMENT

We object to the development proposed by GBC as 20 years of research evidence has shown that the continual fragmentation of natural habitat has caused the dramatic decline of our birds and wildlife species to levels when even our most popular species are under threat. Gardens planned for this development are not enough to combat this decline.

All habitat within or adjoining the parcel of land called A46 are priority habitats under the NERC Act including protected species. Therefore it is vital that this is a key consideration when drafting the Local Plan. However GBC has failed to adequately consider the protection of wildlife within Policy 14.

The following are becoming increasingly rare in the local area:- Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beatles, Skylarks, Toads, Lizards, Grass Snakes, Adders, Slow worms, Badgers, Bats.

There are vitally important ecological networks (green infrastructure corridors) that surround A46 (namely Ancient and Semi-natural Woodland, Veteran Trees, Hedgerows, Semi-improved Grassland, Farmland and the Stream which flows along the back of Guildford Road properties lining the field at the back of The Old Vicarage, Wyke). These connect to other important and protected sites within Normandy Parish and the wider countryside (namely Wanborough and Normandy Woods Site of Nature Conservation Importance (SNCI), A47 The Paddocks SNCI, Normandy Pond SNCI (into which the stream runs) . Normandy Common SNCI (put forward by the Surrey Local Nature Partnership in 2015), Wyke Churchyard SNCI and Little Flexford SNCI.)

This site is in close proximity (0.8 km) to the European Nature 2000 "Thames Basin Heaths Special Protection Area” that hosts 3 rare ground-nesting bird species in a rare heathland habitat.

GBC should apply constraints when calculating the overall housing target in the Borough because of the TBHSPA (NPPF). GBC has not applied constraints and so are compromising sensitive 'designated wildlife sites and landscapes' for pro development. A46 is an 'unsustainable' development so therefore fails Policy 5.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3104  Respondent: 15437313 / Sarah Gooden  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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A46 WAS NOT PROPOSED OR CONSIDERED AS A STRATEGIC SITE IN THE FIRST CONSULTATION

A46 'strategic site', was not previously proposed in an earlier consultation. It is not appropriate development at this stage. In 2014's consultation A46 was 'safeguarded'. It was not removed from the Metropolitan Greenbelt. 'Exceptional circumstances' have not been demonstrated or approved by the Inspectorate. You can't just inset boundaries around pieces of greenbelt, A46/A47/A50 and urbanise them. They must remain Green Belt, according to the recent Solihull ruling. So we object to GBC's proposal to build over Green Belt land with the Local Plan.
In addition there has been no meaningful engagement made or requested from local people. We object to the fact that GBC have not listened to residents and have breached the National Planning Policy Framework (NPPF).

**Sensitivity versus Sustainability**

We understand that two of the key concepts that underpin the Local Plan are: Sustainability and Sensitivity. Individual settlements are ranked on both counts and development is favoured in the most sustainable ones whereas it is least favoured in the most sensitive ones. What is significant here is that for the purposes of assessing Sustainability, Normandy and Flexford have been treated as one settlement which maximises its score on this count - whereas in terms of Green Belt Sensitivity the open area between the two settlements is disregarded which reduces our score on that one. This is simply inconsistent. In fact the original data (used in the first consultation) identified Normandy as one settlement. The data was rewritten in 2014 dividing the settlements in two. Data cannot be changed.

We object to the deliberately misleading and inconsistent calculations used to override our Green Belt. GBC's intention to build 1,100 new homes in Normandy and Flexford shows no objective assessment of the needs of existing residents in these settlements.

Thames Basin Heaths Special Protection Area's SANG Avoidance Strategy is about to expire (2016). We object to the fact that a new Avoidance Strategy for TBHSWPA is not available. There is 'bespoke' SANG on A46 but there is no guarantee the SANG will be delivered by the developer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**TRAFFIC CHAOS**

We object to the planned development because it will cause traffic chaos and gridlock. When GBC's elected councillors voted through the Draft Plan (on 24.5.16) they failed to scrutinise the Strategic Transport Report - a major piece of evidence. (Adjournment was requested so that this vital piece of evidence could be considered but GBC's councillors failed to allow this).

Surrey County Council's traffic simulations verify that the level of traffic on our roads is already above the capacity that they were designed for. GBC's unrealistic growth plans for Normandy and Flexford will force more traffic onto the already congested A3, A323, C16 and D60. There is no evidence of secure funding for any improvements to the A3 during the lifetime of the Draft Plan.

The already highly congested road network in and around Normandy/Flexford will grind to a halt at peak times causing significant adverse impact to the daily lives of local residents and small businesses. One major existing traffic congestion issue is the railway arch in Westwood Lane which only allows alternate single lane through traffic. It is already hazardous and a bottleneck for traffic at peak times. There is no capacity to change this in the future. The increased traffic will also...
cause a massive increase in exhaust pollution with excessive levels of nitrous oxide and carbon dioxide - threatening the health of all residents.

Traffic Black Spots Near Site Access - North end of Parcel of land A46 (Guildford Rd Junction with Westwood Lane).

Access to any development of houses and I or flats at rear of The Old Vicarage, Wyke would cause increased traffic dangers to an already very dangerous junction at corner of Westwood Lane and Guildford Road where there have been several fatalities.

There is also already heavy traffic at the Wyke Primary School across the road from the same junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**GREEN BELT**

We object to the GBC Planning Policy team ignoring the "Openness" of the Green Belt land between Normandy and Flexford (recognised as such in the Green Belt and Countryside Study documents).

Such a large development as proposed would bring with it a huge increase in street lighting which would generate significant light pollution. This would be easily visible from the Surrey Hills AONB ruining the view for all time, for residents and visitors to the area.

Furthermore, Policy 14 also states that "permission would not be granted for proposals that are likely to materially harm the nature conservation interest of local sites unless clear justification is proved that the need for development clearly outweighs the impact on biodiversity". If there was no "alleged" need for a Secondary School in the West of the Borough, the THBSPA and SSSJ would not allow this site to be taken out of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In Conclusion - we object to the fact that Green Belt is being eroded by disproportionate 'strategic sites' without secure funding for infrastructure and road improvements, inset villages, insetting, the manipulation of boundaries, using rural exception sites outside settlement areas for the whole Borough rather than 'needs' of individual rural communities.

Guildford and the surrounding village and countryside will be damaged irreparably.

NPPF 17 requires local authorities to 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the greenbelts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it.' GBC Draft Local Plan does not meet the requirement of Policies S2, H3, P6, 04).

USE BROWNFIELD SITES FIRST

It would seem far more sensible to build more homes on Brownfield Sites first. These should be in or near Guildford town centre - close to the station and existing services eg Woodbridge Meadows, Walnut Tree Close and North Street. Normandy’s station is a tiny rural station (Wanborough) which would in no way support the proposed 100% population increase.

It would be better to provide accommodation for 80-90% of university students on campus, freeing up hundreds of homes in the town - instead of GBC’s proposed 60% of university students living on campus.

Redundant retail space should be turned into homes as there should be no need for massive retail expansion in the town (due to traditional retail activity falls resulting from increased internet shopping habits).

We trust that our comments will be considered carefully by GBC before the Local Plan is finalised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
FLOODING

We object to GBC’s building of 1100 homes in land parcel A46 due to insufficient attention to the significant flooding risks already present in this area.

There is an extremely high water table in the Normandy/Flexford area and no reference in the GBC plans to improve the water/sewerage management. Already there is inadequate drainage in Normandy and sewerage back-flush problems are regularly experienced around Guildford Road and Glaziers Lane.

Every winter the fields in and around Normandy are subject to extreme flooding and therefore unsuitable for building on.

The assessment carried out of the available land takes into account old data regarding flood risk and we question its value.

For a number of years there has been much concern about the high levels of flooding in St Mark’s Churchyard, Wyke and the field at the rear of The Old Vicarage is very boggy ground, subject to extreme flooding. Every winter the land is shin-deep in water and regularly floods some of the properties lining it (e.g. Tanglewood was flooded by the storms of recent years with several inches of water entering car and integral garage).

Stream Through Land

There is a significant stream which flows along the back of the Guildford Road properties that line this field (behind The Old Vicarage, Wyke). This runs very high in rainy weather and regularly flows over its banks.

Building development on this site and area would exacerbate existing and significant flooding problems. There would be far fewer fields to absorb the excess water and the new “hard-standing” would affect even more adversely the general drainage and sewerage, not to mention the strain added by an increased number of users.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I also object to the plans to build a new interchange onto the A3 at Burnt Common to take all the extra traffic going through our village from the proposed developments - not only at Garlick Arch but the proposals for Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm. Send Road and Send Barns Lane is already extremely congested and would become grid-locked.

Finally, I object to the renewed application for 2 travelers' pitches at Send Hill. This road is extremely narrow and the surrounding countryside a favourite walking spot for many Send residents, let alone visitors to the cemetery who would lose the peace and tranquillity of that place should the travellers be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3097  Respondent: 15437505 / Terri Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A3 Highway Infrastructure

I OBJECT to the inclusion of land for new on/off slip roads at Burnt Common. These would draw in a huge amount of 'through' traffic from the area and funnel it through the A247 through West Clandon and or the Ripley Road from East Clandon via HM Prison Ripley and Tithe Barns Road. Both these routes are narrow and dangerous and the addition of traffic to them to gain/leave A3 access would be seriously detrimental to both villages, in terms of road safety, road damage and air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6717  Respondent: 15437505 / Terri Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy D4

I OBJECT to the insetting of villages a.k.a. removal of villages from Green Belt protection. I OBJECT to the insetting of West Clandon, Send, East Horsley and West Horsley which will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB.

These neighbouring village developments will result in higher density development, additional road traffic and use of infrastructure in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6718  Respondent: 15437505 / Terri Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3

I OBJECT to Rural Exception Homes that would be allowed to be permitted where the site adjoins or is closely related to a defined or a non-defined rural settlement on the grounds that this gives permission for development of these types of buildings in any area near existing dwellings. The wording of the policy is far too wide and as drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6715  Respondent: 15437505 / Terri Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P1

I SUPPORT the Surrey Hills Area of Outstanding Natural Beauty (AONB) being conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development and that there is a presumption against major development in the AONB in accordance with the NPPF.

However I OBJECT to inappropriate exceptions to this policy, such as the proposed "Visitor Centre" at Newlands Corner which has no place imposing itself on the most beautiful scenery in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2

I OBJECT to the many proposals that do not protect the Green Belt in the Borough. The Green Belt constitutes 89% of the borough and the local plan proposes that two thirds of the housing and industrial development is to be built on Green Belt land. The Green Belt was established in perpetuity to protect valuable countryside from the type of development now proposed. The proposals are not occasional, exceptional developments on Green Belt for special circumstances but development on the Green Belt on an enormous scale over various sites in the North East of the borough. By any measure the proposed development on Green Belt are excessive and unsustainable.

I OBJECT to extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. The scope for development on the perimeters of Green Belt villages will result in inappropriate encroachment into the countryside.

I OBJECT that in 14 Villages in the Green Belt, "Limited infilling may also be appropriate outside the inset or identified settlement boundaries" as this will encourage large numbers of developments on village edges in the Green Belt which will inevitably impact the openness of the Green Belt.

I OBJECT to the enormous impact on the Green Belt of the proposals for large scale developments on Green Belt land at Wisley Airfield, Gosden Hill Farm, various sites in East and West Horsley and Garlicks Arch at Send. These proposed developments will have a huge impact on our local roads, rail services, medical facilities, shops and other infrastructure and will adversely affect our amenity and our tranquil rural village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to the random Settlement Boundary which has been imposed our village, East Clandon, without any consultation of any kind or to explain the likely impact of such a boundary on this 900 year old village. As stated earlier Policy H3 proposes Rural Exception Homes could proliferate on the borders of this area which would not be appropriate for this conservation area.</td>
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<td>There is insufficient detail to justify the number of houses planned. The Plan is therefore flawed from outset.</td>
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<td>I trust that you will take my objection into consideration when considering the Draft Local Plan.</td>
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I object in the strongest terms to Guildford Borough Council’s Draft Local Plan June 2016.

I believe the Draft Local Plan is unsound and unsustainable due to lack of detail on basic infrastructure including the road network. Priority should be given to a solution being found and implemented to relieve the extensive existing traffic problems in and around the Guildford area especially the town centre and the A3 arterial route.

Until congestion relief is delivered on a sustainable basis it would be unsound to consider any major development in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I Have 3 points to make

1) There is already frequent congestion on the A3 and A3100 which run through Guildford and lead to gridlock in Burpham and cause high pollution levels on a frequent basis. Guildford Council have conveniently overlooked this and have provided no information as to current levels and the impact of pollution of up to 2000 more properties at Gosden Hill Farm.

2) The Local Plan should include improvements to busses & public transport so cars are less essential. By this I mean more than just a Park and Ride included in the Gosden Hill development.

3) There is no certain reference to Guildford being in the Surrey Hills Area of Outstanding Natural Beauty and the Metropolitan Green Belt and how Guildford Council respect and plan to maintain these.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</tbody>
</table>
We object most strongly to the above proposal. Although we are not living in the borough of Guildford, Cobham be affected by such a development as we believe the traffic on the A3 would be absolutely horrific if the proposal should go ahead. The slip road off of the A3 to Cobham is already a nightmare every morning, and we dread to think of the impact such a large development would make.

Parking is also a major problem in Cobham at the moment, and this would become intolerable with so many more houses in the area.

We trust that the Council will reject this most inappropriate scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1620  Respondent: 15437729 / Terry Worsfold  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Why is only 1/4 of the CIL funds being allocated to such important issues. When you consider a new school in Effingham was going to cost around £20 million the funding is totally inadequate. Also if such a massive re-structuring of the Guildford Borough is going to be undertaken where is the financial plan. The business sector would never consider such a plan without ensuring the funding, it seems funding does not enter the equation in the public sector which probably explains why we are in such a mess

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6741  Respondent: 15437729 / Terry Worsfold  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Heath View East Horsley and although for reasons best known to the boundary dept I am technically in the parish of Effingham, I am very much a Horsley person having lived and participated in the village for the past 65 years.

The planned development sites will ruin the village. The wider infrastructure of roads, drains, schools and medical facilities will be completely inadequate. These issues are only addressed by a few short sentences in the a 250+ page report giving
the strong impression the council does not care about the impact and consequences on the lives of the people already in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6740  Respondent: 15437729 / Terry Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are a village which is part of the Surrey Hills in the same way as Gomshall for example. We are not and do not want to be part of the urban sprawl north of the M25 and therefore our green belt status should be protected.

Of course small scale growth to enable others to enjoy are village is appropriate but 500+ houses is completely unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6742  Respondent: 15437729 / Terry Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Heath View East Horsley and although for reasons best known to the boundary dept I am technically in the parish of Effingham , I am very much a Horsley person having lived and participated in the village for the past 65 years.

The planned development sites will ruin the village. The wider infrastructure of roads, drains, schools and medical facilities will be completely inadequate. These issues are only addressed by a few short sentences in the a 250+ page report giving the strong impression the council does not care about the impact and consequences on the lives of the people already in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Garlick's Arch (policy A43)

The proposal to build so many new houses and light industrial storage/workshops on what is part of the Green Belt defies all reason. We have been constantly told that the green belt was safe and it was essential for it to remain in place in order to prevent urban sprawl.

Villages need to keep their separate identities but if the green belt barriers are ripped down then how is this to be achieved? I object to any in-setting of any villages in the Green Belt. Last year an application to build 25 houses on part of this site was refused, so how can the building of 400 houses suddenly become acceptable? This is a disproportionate amount of development in one area of the borough.

Send Marsh /Burnt common has no shops and very limited resources – I hardly think that "Little Waitrose" can be listed as a shop when it only an overpriced addendum to the garage. The doctor's surgery is over-subscribed and getting an appointment is becoming a significant problem. I understand that plans have been mooted to reduce further the bus timetable in the area. In order to go about one's normal everyday life recourse will have to be made to the motor car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- New north and southbound slip-roads to and from the A3 (policy A43a)

The Clandon Road once was a quiet road. Now the traffic starts to build up each day in the early hours and I am regularly woken by the sound of traffic (even with the benefit of double glazing) at just after 5.00 am. This is now, what will be the position once additional traffic is encouraged to use the new slip roads? Once there was the all-day breakfast now will we have the all-day traffic jam?

The A247 hasn't much more capacity so more vehicles will equal more congestion. Working in Ripley I used to be able, with a slight delay, to make a right turn into the A247 out from where I live in Woodlands. Now I have to make a detour in order to avoid this manoeuvre as it has become progressively more difficult due to the numbers of vehicles using the road.

Many cyclists use the road. It is quite narrow with little or no scope to be widened. I have safety concerns that when cars are held back they tend to travel a little faster in order to make up for lost time and if a cyclist happens to be in the way ....
Petrol and diesel cars have one thing in common, when static in jams, they pollute. Has appropriate research been undertaken to consider the effects on our health? If not why not?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3107  **Respondent:** 15437825 / Graham Hoile  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am supporting the retention of the land used for Allotment use.

The area is already saturated with housing, parking problems and traffic.

Building on this land will rob local residents of a worthwhile pastime and leisure activity, we will also lose the wildlife aspect as well.

The Broadacres and Oakfields is a nice area to live having lived here for 18 years like many residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3110  **Respondent:** 15437889 / Janet Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land north of Saltbox Road – allocated as a burial ground. I support this development, subject to suitable arrangements for parking and suitability of the site on environmental grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Slyfield Area Regeneration Plan I object to the number of houses being proposed (current suggestion appears to be 1750).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3112  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Slyfield Area Regeneration Plan I object to the number of houses being proposed (current suggestion appears to be 1750).

The A320, which is planned as the access road, already exceeds capacity and no development should take place until proper access is sorted out. A high percentage of these homes should be affordable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6748  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Development in Urban areas and inset villages. Development in the villages should be appropriate in scale and have no unacceptable effect on the occupants of existing buildings. This has not always been the case with previous infilling developments which have been accepted in Jacobs Well.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6747  **Respondent:** 15437889 / Janet Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Centres Jacobs Well would seem to qualify as an existing local centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6749  **Respondent:** 15437889 / Janet Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure and delivery It is vital that stringent measures are put in place to ensure that infrastructure improvements precede development. Our village already suffers from unacceptable traffic congestion leading to delays and high air pollution levels. The development of Slyfield including a possible 1750 homes would place an unacceptable burden on the A320 and our village of Jacobs Well.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6750  **Respondent:** 15437889 / Janet Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Supporting DfT’s Road Investment Strategy

I support the improvements planned for the A3 through Guildford, which are long overdue.

I object to the CLLR which is not a sustainable way for traffic to reach the A3 and would have disastrous consequences in terms of flooding, habitat destruction, dangerous junctions and noise and air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6744  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt and Limited Infilling I object to the removal of the village of Jacobs Well from the Green Belt. Infilling in our village has already led to planning permission being granted for developments which are totally out of character with the surrounding properties.

I object to the use of large swathes of Green Belt land for development. National policy attaches great importance to the openness and permanence of the Green Belt and this openness has a significant part to play in the well being of our population. The heritage of future generations should not be squandered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6745  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Flooding, Flood risk and groundwater source production

I am totally opposed to any development on flood plains. Our village suffers from flooding, being close to the floodplain near Burpham Court Farm where a major road development The Clay Lane Link Road remains part of the local plan for infrastructure despite part of the area being 3b flood plain. The Slyfield Area regeneration project also proposes development on some 3b floodplain, to which I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6746   Respondent: 15437889 / Janet Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Basin Heath SPA

I support measures which protect this precious habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6743   Respondent: 15437889 / Janet Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Planning for our borough – our spatial development strategy

I object to the proposed SHMA figures. I support the submission by Guildford Residents’ Associations which challenges the figure of 693 houses per annum. The reports commissioned by GRA and others prove that the methodology used has been deliberately withheld from public scrutiny and seems to be flawed and that such a high level of housing is not justified, particularly in the light of the recent economic and political situation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/416   Respondent: 15437889 / Janet Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Jacobs Well
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the inclusion of Jacobs Well as a Rural Centre providing much needed services from our parade of shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1462  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The figure for housing need, though now reduced to 654, is still far too high and I support the serious challenge submitted by the GRA to the analysis produced by G. L. Hearn. I implore the council to look again at this figure to ensure that it accurately represents real identified housing need for our borough alone before our countryside and lovely town are ruined for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1647  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as a whole as I cannot support it when the Leader of the Council says (as he did at the Council meeting on 24/5/2016) that "given the size of this beast there is no way it is 100% correct". Whilst Councillor Spooner evidently thinks it is acceptable for the Local Plan to contain errors I and, I am sure, many residents of the Borough, do 'not agree, especially when those errors are errors of fact or contradictions of other statements in the plan or its supporting documentation. Some examples from documents on the Council website supporting the draft local plan, relating to areas close to my home (I haven't looked at other areas) are:
From Guildford Borough Settlement Profiles:

Send - Retail and employment:

Send village has a small parade of shops with flats above and there is a reasonable selection of convenience and comparison shops, including a post office, mini-supermarket, and sandwich bar.

Send - Transport:

A bus also goes to Kingston upon Thames 13 times a day during the week, with limited weekend service.

Send - How well the village works:

As a connected village, Send scores very poorly as public transport is limited ....

Send Marsh/Burntcommon: Retail and employment:

The only convenience shop within the settlement is located in a petrol station and located opposite the entrance to Boughton Hall Avenue.

Send Marsh/Burntcommon - Transport

There is a reasonable bus service. ••

Send Marsh/Burntcommon - How well the village works:

As a connected village, Send Marsh scores very poorly as public transport is very limited ••.

Although there are some local shops and businesses....

From Major Village Expansion: Guildford Borough Green Belt & Countryside Study

Send

Send has a bus service rating of 3 within GBC's settlement hierarchy and therefore has good public transport connections.

Send Marsh/Burntcommon

Send Marsh and Burntcommon is served by a good bus service scoring 3, as defined within GBC's Settlement Hierarchy.

In an earlier document The Villages Medical Centre, which is located on Send Barnes Lane, Send, was shown instead as being in Send Marsh.

Inconsistencies:

Send: The Settlement profile statement that "Send scores very poorly as public transport is limited" is totally inconsistent with the Green belt & Countryside Study Major Village Expansion comment that Send "has good public transport connections".

Send Marsh/Burntcommon: The Settlement profile statement that "Send Marsh scores very poorly as public transport is very limited" is totally inconsistent with the Green belt & Countryside Study Major Village Expansion comment that Send Marsh and Burntcommon "is served by a good bus service".

Also, the settlement Profile for Send Marsh/Burntcommon contradicts itself by saying under Transport "there is a reasonable bus service" and under How well the village works "Send Marsh scores very poorly as public transport is very limited".

So according to the Local Plan support documentation Send Marsh/Burntcommon:

- Has a reasonable bus service
- Scores very poorly as public transport is very limited
- Is served by a good bus service
One thing is for sure, you would find it very difficult to find anyone in Send or Send Marsh/Burntcommon who thin ks that the bus service is good.

Errors:

Although it is correct to say that bus service 515 runs from Guildford to Kingston it is NOT CORRECT to say that this bus service serves Send village. A 515 bus travelling from Kingston to Guildford leaves the A3 after the M25, travels along Ripley High Street and Portsmouth Road, then turns left at the Shell Petrol Station roundabout onto the A247 towards Clandon and onto the A3. It DOES NOT go into the village of Send.

Although Send has a convenience store in the form of McColls, with the best will in the world this cannot be described as a mini-supermarket.

The Villages Medical Centre is in Send NOT Send Marsh - I confirmed this with Dr Burns when I identified this error in September 2014.

Send Marsh/Burntcommon Settlement Profile : How well the village works includes "there are some local shops" Where are they? The only convenience store is at the Shell Garage as mentioned elsewhere. There are no other "shops".

Although these errors may at first seem minor, they were very significant as the information was used in scoring the different villages for Local Plan purposes, resulting in erroneous scores for both Send and Send Marsh.

How can anyone trust the content of the Local Plan when there are such errors and blatant inconsistencies in the supporting information on which it is based? There are others, including saying that Global Companies have their headquarters in Guildford. One of those quoted is "Phillips". Having worked for the Dutch Philips Electronics Group for over 30 years I, unlike the Council, at least know how to spell Philips correctly and also that the Philips HQ in Guildford is that of the UK Philips organisation, the UK being only one of more than one hundred countries in which Philips operates, whilst the Global HQ of Philips Electronics is in the Netherlands and has been since 1891. Is the Council again trying to mislead the public?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This will have the effect of attracting even more traffic from Burpham and the proposed Gosden Hill Farm 2000 home, Park & Ride and Secondary School development to Send, Send Marsh/Burntcommon and Ripley than will already be attracted by the A34a proposed new A3 junctions onto and off from the A247 at the junction with B2215 London Road at Burntcommon, including even more traffic through Send and Send Marsh/Burntcommon to/from Woking and surrounding area.

I realise that such an "Aspirational" scheme is not considered as a key infrastructure requirement on which the delivery of the plan depends but as 5.91 on page 25 includes "However, we do consider that it is appropriate to promote these schemes at this time" I consider it appropriate to strongly object to scheme ASP3 at this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1648  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Site Policies A42 Clockbarn Nursery, Tannery Lane, Send, Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley and A57 The Paddocks, Rose Lane, Ripley as there is already a very significant problem with parking in shopping areas locally and this would only be exacerbated by the addition of a further 507 local families. Ripley is particularly bad for parking with it often being impossible to find a free space. Send is not much better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2570  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

From Guildford Borough Settlement Profiles:

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A bus also goes to Kingston upon Thames 13 times a day during the week, with limited weekend service.

Send - How well the village works:

As a connected village, Send scores very poorly as public transport is limited...

Send Marsh/Burntcommon - Retail and employment:

The only convenience shop within the settlement is located in a petrol station and located opposite the entrance to Boughton Hall Avenue.

Send Marsh/Burntcommon - Transport

There is a reasonable bus service...

Send Marsh/Burntcommon - How well the village works:

As a connected village, Send Marsh scores very poorly as public transport is very limited....

Although there are some local shops and businesses....

From Major Village Expansion: Guildford Borough Green Belt & Countryside Study

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Send has a bus service rating of 3 within GBC's settlement hierarchy and therefore has good public transport connections.

Send Marsh/Burntcommon

Send Marsh and Burntcommon is served by a good bus service scoring 3, as defined within GBC's Settlement Hierarchy.

In an earlier document The Villages Medical Centre, which is located on Send Barnes Lane, Send, was shown instead as being in Send Marsh.

Inconsistencies:

Send: The Settlement profile statement that "Send scores very poorly as public transport is limited" is totally inconsistent with the Greenbelt & Countryside Study Major Village Expansion comment that Send "has good public transport connections".

Send Marsh/Burntcommon: The Settlement profile statement that "Send Marsh scores very poorly as public transport is very limited" is totally inconsistent with the Greenbelt & Countryside Study Major Village Expansion comment that Send Marsh and Burntcommon "is served by a good bus service".

- Also, the Settlement Profile for Send Marsh/Burntcommon contradicts itself by saying under Transport "there is a reasonable bus service" and under How well the village works "Send Marsh scores very poorly as public transport is very limited".
- So according to the Local Plan support documentation Send Marsh/Burntcommon: Has a reasonable bus service
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One thing is for sure, you would find it very difficult to find anyone in Send or Send Marsh/Burntcommon who thinks that the bus service is good.

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Send Marsh/Burntcommon Settlement Profile: How well the village works includes "there are some local shops" Where are they? The only convenience store is at the Shell Garage as mentioned elsewhere. There are no other "shops".

Although these errors may at first seem minor, they were very significant as the information was used in scoring the different villages for Local Plan purposes, resulting in erroneous scores for both Send and Send Marsh.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3149   Respondent: 15438049 / David A Sprigings   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site policy and at Garlick's Arch Send Marsh, Burntcommon and Ripley and A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burntcommon as I believe that the circumstances leading to the inclusion of these site policies in the Local Plan are in breach of regulation requirements under The Town and Country Planning Act.

They were only presented to Guildford Borough Council on 11 May 2016, just 13 days before the Executive Meeting of the Council to agree putting the updated Draft Local Plan, including these two site policies, out for Public Consultation. I believe that this is in breach of regulations as there was totally insufficient pre-consultation under Regulation 18.

The very late addition of A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley is clearly demonstrated by the Inclusion on GBC's Local Plan website of a draft version of the Submission Document, dated June 2016 on the front cover, which includes A43 (2016 classification) as Land at Burntcommon Warehouse with 100 homes, which is site proposal 74 from the 2014 Draft Local Plan. This is still there on 10/07/2016.
The very late inclusion of A43 and A43a is also clear from the fact that in the Local Plan section on page 04 of the Council's Summer 2016 issue of "About Guildford", which was delivered in June 2016, it says "....In April this year we published the revised Draft local Plan.."

How could the Council publish the revised Draft Local Plan in April 2016 when site allocations A43 and A43a were not presented to the Council for inclusion in the revised Draft Local Plan until 11 May 2016 and the Executive did not approve the draft for submission for Public Consultation until 24 May 2016?

Is the Council trying to mislead the public by suggesting that the current Draft Local Plan was published in April?

I object to site policy A43 Land at Garlick's Arch and A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burntcommon as I believe that the circumstances leading to the inclusion of these site policies are, at best, highly unorthodox and irregular and need thorough checking by the Planning Inspectorate.

I understand from a very reliable source that the land for Site Policy A43a Land for new north facing slip roads to/from the A3 at Send Marsh/Burntcommon has been gifted to the Council by its owners and that those owners have also offered to pay the £20m cost of A43a.

Isn't it a strange coincidence that part of the land at Site A43 land at Garlick's Arch is also owned by the owners of the land being gifted to the Council for Site A43a, which, if site A43 is approved, would no doubt result in an extremely large financial windfall for the owners?

Isn't it also a strange coincidence that these are the very same sites which were only proposed to the Council for inclusion in the Draft Local Plan on 11 May 2016, which I believe to be in breach of regulations as in 11 above?

Although I understand that the cost of the A3/A247 on/off slip roads is to be borne by the owners of the land, the Draft Guildford borough Infrastructure Delivery Plan 2016 shows on page 68 the £10m likely cost for each of the two slip roads as "Developer funded". If the cost IS to be borne by the land-owners who have gifted the land to the Council, it is very misleading to state in the plan documentation that the cost is to be Developer funded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3177  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of 400 new homes on site policy A43 Garlick's Arch Send Marsh, Burntcommon and Ripley as there is no need for this many to be built. The site 74 Land around Burntcommon warehouse which included 100 new homes should have the 100 homes reinstated and increased to 159. The plan Sustainability Appraisal page 110 shows 100 as Housing Capacity for Use H and a further 59 Housing Capacity for Use E, so 159 in total.

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it is an area of Ancient Woodland which includes a number of trees with Tree Preservation Orders. These beautiful trees should be retained and there should be no building on this site.
At the Council Executive Meeting on 24/05/2016 I was appalled by the comment from one Councillor in support of inclusion of site policy A43 "they are only trees, they are going to die anyway".

Yes, they will die (eventually) anyway, but this very short-sighted view ignores the fact that the trees date back to the 161 Century and the life span of such trees is several times that of any houses or industrial buildings, as well as being much better to look at and benefiting the environment instead of harming it.

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley on the grounds of the harm it would do to the local environment.

In terms of the environment the words of Tony Juniper, President of the Wildlife Trusts, are much better than my own so I quote his from the Spring 2016 issue of Surrey Nature, published by the Surrey Wildlife Trust:

"Many people have become used to hearing that looking after our environment and conserving nature is an unaffordable luxury, especially during times of economic hardship. Nothing could be further from the truth. The more research we have the more we see that nature is not a distraction from our interests as a country, but is essential for our health, wealth and security. At a time of rising population, increased demand for resources and pressure on the land it is more vital than ever that this message is heard".

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley on the grounds of the harm it would do to the local environment in terms of noise pollution.

At the Executive Council Meeting on 24/05/2016 a point made supporting the proposed amendment to remove A43 Garlick's Arch from the Draft Local Plan was that the noise problem from A3 traffic to residents living on the other side of Portsmouth Road from Garlick's Arch would be worsened by felling the Ancient Woodland on the site.

The response from the Leader of the Council was that the trees do not form a noise barrier, a view which was met with derision from the members of the public present, including myself.

I also object to A43 on the grounds of Noise Pollution as noise metering has, I understand, been carried out between Garlick's Arch and the A3 and, I am assured, the readings in decibels exceed the allowable noise level for the building of new homes so none should be built there.

It seems that the Council chooses to ignore anything which is a barrier to its plans.

I object to the inclusion of Site Policy A43 Garlick's Arch, Send Marsh and Burntcommon and Ripley on the grounds of its adverse impact on wildlife on the site.

The site has numerous species including Badgers, Bats, Deer, Red Kite and their habitat would be destroyed by this development. I believe that the Water Vole, now rare in this country, has also been seen. I understand that no wildlife study has been undertaken in respect of this site which appears to be another procedural shortcoming.

I object to site policy A43 Land at Garlick's Arch and A43a Land for new north facing slip roads to/from the A3 at Send Marsh/Burntcommon In respect of the proposed timing of these developments in the Draft Local plan.

Site A43 and at Garlick's Arch is stated to be suitable for the first phase of planned development (first 5 years) (Executive 11 May 2016 Supplementary Information page 8 Delivery "....the Garlick's Arch site is deliverable in the first five years of the plan") whilst page 68 of the Draft Guildford borough Infrastructure Delivery Plan 2016 shows both SRN9 "A3 northbound on-slip at A247 Clandon Road" and SRN10 "A3 southbound off-slip at A247 Clandon Road" to be delivered between 2021 and 2027.

Does no-one involved with the Draft Local Plan have any common sense or apply any logic to these plans, especially in respect of development timing schedules?
If it is the case that, should both these site policies be approved and delivered with A43 first and A43a some years later, the traffic congestion in the local area would be an absolute nightmare.

The very numerous heavy lorries that would be required to remove huge trees and deliver vast amounts of building materials to site A43 would have to use existing inadequate roads, either off the A3 through Ripley or via the Burntcommon roundabout at the junction with the A247.

This would be intolerable and dangerous. Portsmouth Road junction with Send Marsh Road is already a dangerous black spot for accidents, as I know to my cost since a car drove into mine there earlier this year, the other driver having ignored the Give Way signs for traffic turning onto Portsmouth Road from Send Marsh Road. The existing junction of the A247 and the A3 southbound on-slip is also an existing dangerous accident black spot. Both of these would only become worse and more dangerous with these planned developments, as would the junctions of Burnt Common Lane, Kiln Lane and Grove Heath Road with Portsmouth Road.

I **object** to site policy A43 Land at Garlick's Arch Send Marsh/Burntcommon in respect of the lack of infrastructure planning for the site.

The sections of the Guildford borough Infrastructure Delivery Plan 2016 in respect of Utilities:

Electricity & Gas Distribution & Supply pages 76/77/78

Water Supply pages 78/79

Wastewater Connections & Treatment pages 79/80

Flood Risk Reduction: Surface Water Mitigation Measures pages 80/81

contain no mention whatever of A43 Garlick's Arch.

How can this planned site development go ahead when there are apparently no plans whatsoever to provide the utility infrastructure which would be required to support 400 homes and 7000 sq mts of industrial/warehousing development?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/5275</th>
<th>Respondent:</th>
<th>15438049 / David A Sprigings</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object to site policies A43 Land at Garlick's Arch Send Marsh, Burnt common and Ripley and A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burnt common as I believe that the circumstances leading to the inclusion of these site policies in the Local Plan are in breach of regulation requirements under The Town and Country Planning
They were only presented to Guildford Borough Council on 11 May 2016, just 13 days before the Executive Meeting of the Council to agree putting the updated Draft Local Plan, including these two site policies, out for Public Consultation. I believe that this is in breach of regulations as there was totally insufficient pre consultation under Regulation 18.

The very late addition of A43 Land at Garlick’s Arch Send Marsh, Burntcommon and Ripley is clearly demonstrated by the Inclusion on GBC’s Local Plan website of a draft version of the Submission Document, dated June 2016 on the front cover, which includes A43 (2016 classification) as Land at Burntcommon Warehouse with 100 homes, which is site proposal 74 from the 2014 Draft Local Plan. This is still there on 10/07/2016.

The very late inclusion of A43 and A43a is also clear from the fact that in the Local Plan section on page 04 of the Council’s Summer 2016 issue of “About Guildford”, which was delivered in June 2016, it says “... in April this year we published the revised Draft Local Plan....”.

How could the Council publish the revised Draft Local Plan in April 2016 when site allocations A43 and A43a were not presented to the Council for inclusion in the revised Draft Local Plan until 11 May 2016 and the Executive did not approve the draft for submission for Public Consultation until 24 May 2016?

Is the Council trying to mislead the public by suggesting that the current Draft Local Plan was published in April?

I object to site policies A43 Land at Garlick’s Arch and A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burntcommon as I believe that the circumstances leading to the inclusion of these site policies are, at best, highly unorthodox and irregular and need thorough checking by the Planning Inspectorate.

I understand from a very reliable source that the land for Site Policy A43a Land for new north facing slip roads to/from the A3 at Send Marsh/Burntcommon has been gifted to the Council by its owners and that those owners have also offered to pay the £20m cost of A43a.

Isn’t it a strange coincidence that part of the land at Site A43 land at Garlick’s Arch is also owned by the owners of the land being gifted to the Council for Site A43a, which, if site A43 is approved, would no doubt result in an extremely large financial windfall for the owners?

Isn’t it also a strange coincidence that these are the very same sites which were only proposed to the Council for inclusion in the Draft Local Plan on 11 May 2016, which I believe to be in breach of regulations as in 11 above?

Although I understand that the cost of the A3/A247 on/off slip roads is to be borne by the owners of the land, the Draft Guildford borough Infrastructure Delivery Plan 2016 shows on page 68 the £10m likely cost for each of the two slip roads as “Developer funded”. If the cost IS to be borne by the land-owners who have gifted the land to the Council, it is very misleading to state in the plan documentation that the cost is to be Developer funded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPS16/5286</th>
<th>Respondent:</th>
<th>15438049 / David A Sprigings</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it is a flood risk. The Environment Agency Flood Risk Map shows this as category 3 high flood risk so it should not be built on. (Policy P4)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5287  **Respondent:** 15438049 / David A Sprigings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire):* ()

I object to the inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it is unsustainable with totally inadequate public transport. Bus services are poor and infrequent, and Surrey County Council is proposing to reduce the number of journeys serving Ripley, Send Marsh, Burntcommon and Send, whilst the nearest Railway Station at West Clandon is a 40 minute walk away, and that is only if you are fit. (Policy S1)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5289  **Respondent:** 15438049 / David A Sprigings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire):* ()

I object to the inclusion of 400 new homes on site policy A43 Garlick's Arch, Send Marsh, Burntcommon and Ripley as there is no need for this many to be built. The site 74 Land around Burntcommon warehouse which included 100 new homes should have the 100 homes reinstated and increased to 159. The plan Sustainability Appraisal page 110 shows 100 as Housing Capacity for Use H and a further 59 Housing Capacity for Use E so 159 in total.

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it is an area of Ancient Woodland which includes a number of trees with Tree Preservation. These beautiful trees should be retained and there should be no building on this site.

At the Council Executive Meeting on 24/05/2016 I was appalled by the comment from one Councillor in support of inclusion of site policy A43 "they are only trees, they are going to die anyway".
Yes, they will die (eventually) anyway, but this very short-sighted view ignores the fact that the trees date back to the 16th Century and the life span of such trees is several times that of any houses or industrial buildings, as well as being much better to look at and benefitting the environment instead of harming it. (Policy 03)

I object to inclusion of site policy A43 Land at Garlick’s Arch, Send Marsh/Burntcommon and Ripley on the grounds of the harm it would do to the local environment.

In terms of the environment the words of Tony Juniper, President of the Wildlife Trusts, are much better than my own so I quote his from the Spring 2016 issue of Surrey Nature, published by the Surrey Wildlife Trust:

"Many people have become used to hearing that looking after our environment and conserving nature is an unaffordable luxury, especially during times of economic hardship. Nothing could be further from the truth. The more research we have the more we see that nature is not a distraction from our interests as a country, but is essential for our health, wealth and security. At a time of rising population, increased demand for resources and pressure on the land it is more vital than ever that this message is heard”.

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley on the grounds of the harm it would do to the local environment in terms of air pollution.(Policy 13)

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley on the grounds of the harm it would do to the local environment in terms of noise pollution.

At the Executive Council Meeting on 24/05/2016 a point made supporting the proposed amendment to remove A43 Garlick's Arch from the Draft Local Plan was that the noise problem from A3 traffic to residents living on the other side of Portsmouth Road from Garlick's Arch would be worsened by felling the Ancient Woodland on the site.

The response from the Leader of the Council was that the trees do not form a noise barrier, a view which was met with derision from the members of the public present, including myself.

I also object to A43 on the grounds of Noise Pollution as noise metering has, I understand, been carried out between Garlick's Arch and the A3 and, I am assured, the readings in decibels exceed the allowable noise level for the building of new homes so none should be built there.

It seems that the Council chooses to ignore anything which is a barrier to its plans.

I object to the inclusion of Site Policy A43 Garlick's Arch, Send Marsh and Burntcommon in respect of the proposed timing of these developments in the Draft Local Plan.

The site has numerous species including Badgers, Bats, Deer, Red Kite and their habitat would be destroyed by this development. I believe that the Water Vole, now rare in this country, has also been seen.

I understand that no wildlife study has been undertaken in respect of this site which appears to be another procedural shortcoming.

I object to site policies A43 Land at Garlick’s Arch and A43a Land for new north facing slip roads to/from A3 at Send Marsh/Burntcommon in respect of the proposed timing of these developments in the Draft Local Plan.

Site A43 Land at Garlick's Arch is stated to be suitable for the first phase of planned development (first 5 years) (Executive 11May 2016 Supplementary Information page 8 Delivery “....the Garlick's Arch site is deliverable in the first five years of the plan”) whilst page 68 of the Draft Guildford borough Infrastructure Delivery Plan 2016 shows both SRN9 "A3 northbound on-slip at A247 Clandon Road" and SRN10 "A3 southbound off-slip at A247 Clandon Road" to be delivered between 2021 and 2027.

Does no-one involved with the Draft Local Plan have any common sense or apply any logic to these plans, especially in respect of development timing schedules?
If it is the case that, should both these site policies be approved and delivered with A43 first and A43a some years later, the traffic congestion in the local area would be an absolute nightmare.

The very numerous heavy lorries that would be required to remove huge trees and deliver vast amounts of building materials to site A43 would have to use existing inadequate roads, either off the A3 through Ripley or via the Burntcommon roundabout at the junction with the A247.

This would be intolerable and dangerous. Portsmouth Road junction with Send Marsh Road is already a dangerous black spot for accidents, as I know to my cost since a car drove into mine there earlier this year, the other driver having ignored the Give Way signs for traffic turning onto Portsmouth Road from Send Marsh Road. The existing junction of the A247 and the A3 southbound on-slip is also an existing dangerous accident black spot. Both of these would only become worse and more dangerous with these planned developments, as would the junctions of Burnt Common, Kiln lane and Grove Heath Road with Portsmouth Road.

I object to site policies A43 and at Garlick's Arch Send Marsh/Burntcommon in respect of the lack of infrastructure planning for the site.

The sections of the Guildford borough infrastructure Delivery Plan 2016 in respect of Utilities:

Electricity & Gas Distribution & Supply pages 76/77/78

Water Supply pages 78/79

Wastewater Connections & Treatment pages 79/80

Flood Risk Reduction: Surface Water Mitigation Measures pages 80/81 contain no mention whatever of A43 Garlick's Arch.

How can this planned site development go ahead when there are apparently no plans whatsoever to provide the utility infrastructure which would be required to support 400 homes and 7000 sq mts of industrial/warehousing development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1335   Respondent: 15438049 / David A Sprigings   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common. Noise levels are already excessive, and local roads, many narrow, would become grid-locked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Local Plan as a whole due to the damage to the historic environment and heritage assets that would result from the excessive scale of the proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. I object to the Local Plan as a whole due to the damage to the historic environment and heritage assets that would result from the excessive scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to inclusion of site policy A43 and at Garlick's Arch, Send Marsh/Burntcommon and Ripley in relation to Sustainable Employment Policy as there is no adequate sound evidence in respect of Employment Land Needs Assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10678  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley in relation to Sustainable Employment Policy as there is no adequate sound evidence in respect of Employment Land Needs (Policy E1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6899  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it would result in the loss of 4 existing successful rural businesses. These have been there for decades and so are clearly sustainable. There is no need for the planned 7000 sq mts of industrial/warehousing on the Garlick's Arch site as the Land around Burntcommon warehouse (site 74 in the 2014 Draft Local Plan) is available and the current plan should revert to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10677  Respondent: 15438049 / David A Sprigings  Agent:
I object to the inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it would result in the loss of 4 existing successful rural businesses. These have been there for decades and so are clearly sustainable. There is no need for the planned 7000 sq mts of industrial/warehouse space on the Garlick's Arch site as the land around Burntcommon warehouse (site 74 in the 2014 Draft Local Plan) is available and the current plan should revert to this (Policy E5).

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Attached documents:

Comment ID: PSLPP16/10674  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

I object to the inclusion of Site Policies A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley and A57 The Paddocks, Rose Lane, Ripley as there is insufficient local infrastructure to support an additional 507 families (Policy I1) especially in respect of:

- Healthcare facilities
- Schools
- Policing
- Social Welfare
- Shops and restaurants
- Parking facilities 25. Safe local roads
- Cycle Lanes
- Pedestrian footpaths

which would be overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10675  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Site Policies A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley and A57 The Paddocks, Rose Lane, Ripley as there is already a very significant problem with parking in shopping areas locally and this would only be exacerbated by the addition of a further 507 local families. Ripley is particularly bad for parking with it often being impossible to find a free space. Send is not much better.

I object to inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley, A57 The Paddocks, Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together these would add more than 5000 new homes and probably 10000 cars to an area within 3 miles of Send.

This huge increase in local car traffic, which would be bound to have a major impact on the local villages of Ripley, Send Marsh/Buntcommon and Send, would significantly increase traffic congestion in the whole area to an unacceptable level.

It would also make the roads more dangerous for children going to/from school.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6868  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as a whole due to the much increased congestion that will result from the developments on trunk roads, A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10666  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as a whole due to the much increased congestion that will result from the developments on trunk roads, A3/M25. (Policy 12)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6905  
Respondent: 15438049 / David A Sprigings  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to inclusion of the policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley on the grounds of the harm it would do to the local environment in terms of air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6916  
Respondent: 15438049 / David A Sprigings  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A35 Wisley former airfield and A44 Clockbarn Nursery, Tannery Lane, Send on the grounds of their adverse impact on local wildlife. There are numerous species of Dragonfly at Boldermere/Wisley Lake, also the rare "wasp" spider, and both Beautiful and Banded Demoiselle Damselflies on the River Wey Navigation, as well as many species of both smaller and larger wildlife which would be adversely impacted by these developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10684  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A35 Wisley former airfield and A44 Clockbarn Nursery, Tannery Lane, Send on the grounds of their adverse impact on local wildlife. There are numerous species of Dragonfly at Boldermere/Wisley Lake, also the rare "wasp" spider, and both Beautiful and Banded Demoiselle Damselflies on the River Wey Navigation, as well as many species of both smaller and larger wildlife which would be adversely impacted by these developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2725  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I request that all my objections and comments are shown to the Planning Inspector.

1. I object to the numerous proposals to undermine the Green Belt in various areas of the this is because the lead party in Guildford Borough Council, Conservative, campaigned for election on their policy of protecting the Green Belt for Guildford Borough residents.

2. I object to the Local Plan as so much of it is dependent on building on or insetting the Green Belt for future building in the Borough as Government advice is very clear that housing need alone is not adequate grounds for building on the Green Belt.

1. I object to the Local Plan as I believe that no "exceptional circumstances" have been identified to justify the proposed building on Green Belt.

1. I object to any in-setting of the villages of Send, Ripley, Send Marsh/Burnt This would result in Woking and Guildford becoming one conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6827  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to the Local Plan as a whole and to the numerous proposals to undermine the Green Belt in various areas of the Borough as Government advice is very clear that housing need alone is not adequate grounds for building on the Green Belt. I object to the Local Plan as so much of it is dependent on building on or insetting the Green Belt for future building in the Borough. I object to the Local Plan as I believe that no "exceptional circumstances" have been identified to justify the proposed building on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of site policy A43 Land at Garlick's Arch, Send Marsh/Burntcommon and Ripley as it is a flood risk area. The Environment Agency Flood Risk shows this as category 3 high flood risk so it should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10683  Respondent: 15438049 / David A Sprigings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan, especially the inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley, A57 The Paddocks, Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together all the extra building on these sites would - considerably increase flood risk in the areas concerned, whilst nothing appears to be done to resolve existing recurring flood problems such as Ockham Road off the A3/Ockham roundabout and the B2215 towards Ripley, both of which flood with alarming regularity.

There is also a risk of additional flooding at the entry to the site by Garlick's Arch where there are a number of existing businesses, between Kiln Lane and Burntcommon Lane junctions. This is because there is a build up of tree debris at the point where the stream enters 3 pipes under Portsmouth Road which, if left unchecked, could form a dam similar to that at the junction of Portsmouth Road and Send Marsh Road which resulted in flooding of numerous houses in Maple Road and Send Marsh Road some years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6873  Respondent: 15438049 / David A Sprigings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Local Plan as a whole as it does not meet the needs of local communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10650  Respondent: 15438049 / David A Sprigings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Draft Local Plan as a whole as I believe that it is not sustainable (Policy S1) For example, no railway station within easy walking distance of Wisley Airfield and Garlick's Arch, poor bus services which are proposed to be reduced, lack of utility infrastructure at Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10668  Respondent: 15438049 / David A Sprigings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as a whole as it does not meet the needs of local communities (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2739  Respondent: 15438049 / David A Sprigings  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate amount of development in one area of the It is noteworthy that the proposed number of additional homes for the total of Guildford Town Centre, Guildford Urban Area and Land Around Guildford Urban Area amounts to 35% of the overall total in the 2016 Draft local Plan (with a decrease of 1356 or over 16% from the 2014 Plan, whilst the total for the area within just 3 miles of Send Marsh amounts to almost 40% of the total (and the total number in Villages increases by over 500 or 24%).

I object to site A43 Garlick's Arch, to the building of 400 houses and 7000 sq m of industrial space. The site floods and is of ancient woodlands. The industrial space is unnecessary. If any is needed, it should be at Slyfield. There is a lack of evidence for the alleged housing need numbers, and local services are inadequate to cope with increased population.

I object to the last-minute inclusion of new sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan as a whole as it is, to me, totally wrong for the Council to sub-contract a large part of the Draft Local Plan work to a private company which in the main works for developers and so suggests the possibility of a strong conflict of interest.

I object to the Draft Local Plan as a whole as I believe that it is not sustainable. For example, no railway station within easy walking distance of Wisley airfield and Garlick's Arch, poor bus services which are proposed to be reduced, lack of utility infrastructure at Garlick's Arch.

I object to the Borough Wide Strategy especially as Wisley airfield, Garlick's Arch and Gosden Hill Farm will have a disproportionate impact on local villages.

I object to the Draft Local Plan as a whole as I believe that it is untenable.

I object to the Draft Local Plan as a whole as I believe that it is unworkable.

I object to the Draft Local Plan as a whole as I believe that the proposed scale of housing development is excessive.

I object to the Local Plan as a whole as I understand that the GBC Transport Strategy Document had not been published when the revised Draft Local Plan Public Consultation began on 61 June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Social Welfare
1. Shops and restaurants
1. Parking facilities
1. Safe local roads
1. Cycle Lanes
1. Pedestrian footpaths

which would be overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan, especially the inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley, A57 The Paddocks, Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together all the extra building on these sites would considerably increase flood risk in the areas concerned, whilst nothing appears to be done to resolve existing recurring flood problems such as Ockham Road off the A3/Ockham roundabout and the B2215 towards Ripley, both of which flood with alarming regularity.

There is also a risk of additional flooding at the entry to the site by Garlick's Arch where there are a number of existing businesses, between Kiln Lane and Burntcommon Lane junctions. This is because there is a build up of tree debris at the point where the stream enters 3 pipes under Portsmouth Road which, if left unchecked, could form a dam similar to that at the junction of Portsmouth Road and Send Marsh Road which resulted in flooding of numerous houses in Maple Road and Send Marsh Road some years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan because the overall impact of sites A35 Wisley former airfield, A43 Garlick's Arch and A25 Gosden Hill Farm, when added to existing residential areas in between, will turn the local villages into a huge suburb and lead to a form of almost continuous Ribbon Development from the M25 to GBC seems to be heading this way with its DRAFT Local Plan, Green Belt insetting policy and Aspirational Road development ASP3.

Ribbon Development should be a thing of the past, not the present and future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10640  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the local Plan as a whole and to the numerous proposals to undermine the Green Belt in various areas of the Borough. This is because the lead party in Guildford Borough Council, Conservative, campaigned for election on their policy of protecting the Green Belt for Guildford Borough resident I believe, therefore, that the Council does not have a mandate for its policy of significant undermining of the Green Belt in the Borough, including insetting of numerous villages such as Ripley, Send and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10647  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Local Plan as a whole as it is, to me, totally wrong for the Council to sub-contract a large part of the Draft Local Plan work to a private company which in the main works for developers and so suggests the possibility of a strong conflict of interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10654  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2) especially as Wisley airfield, Garlick's Arch and Gosden Hill Farm will have a disproportionate impact on local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10657  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Draft Local Plan as a whole as I believe that it is excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10669  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Draft Local Plan as a whole as I believe that it is
2. I object to the Draft local Plan as a whole as I believe that it is unworkable.

1. I object to the Draft Local Plan as a whole as I believe that the proposed scale of housing development is excessive.

1. I object to the Local Plan as a whole as I understand that the GBC Transport Strategy Document had not been published when the revised Draft Local Plan Public Consultation began on 6th June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan as a whole as I cannot support it when the Leader of the Council says (as he did at the Council meeting on 24/5/2016) that "given the size of this beast there is no way it is 100% correct". Whilst Councillor Spooner evidently thinks it is acceptable for the Local Plan to contain errors I and, I am sure, many residents of the Borough, do not agree, especially when those errors are errors of fact or contradictions of other statements in the plan or its supporting documentation. Some examples from documents on the Council website supporting the draft local plan, relating to areas close to my home (I haven't looked at other areas) are:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley, A57 The Paddocks, Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together these would add more than 5000 new homes and probably 10000 cars to an area within 3 miles of Send Marsh which, at almost 40% of the number of additional homes In the revised Draft Local Plan, is wholly disproportionate to such a small area of local villages and their surrounds. (Policy S2) It is noteworthy that the proposed number of additional homes for the total of Guildford Town Centre, Guildford Urban Area and Land Around Guildford Urban Area in the 2016 Draft Local Plan has fallen by 1356 or over 16% from the 2014 Plan, whilst the total additional homes for the small area within just 3 miles of Send Marsh exceeds 5000 and amounts to almost 40% of the total Plan. The total for Villages In the Plan has increased by more than 500 or 32%. There should be more development in urban areas and brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10685  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the Local Plan because the overall impact of sites A35 Wisley former airfield, A43 Garlick's Arch and A25 Gosden Hill Farm, when added to existing residential areas in between, will turn the local villages into a huge suburb and lead to a form of almost continuous Ribbon Development from the M25 to GBC seems to be heading this way with its DRAFT Local Plan, Green Belt insetting policy and Aspirational Road development ASP3. Ribbon Development should be a thing of the past, not the present and future. THIS IS TOTALLY UNACCEPTABLE.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4337  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to site allocations A35 Wisley Airfield, A43 Garlick's Arch and A58 Land around Burnt Common as the scheduled delivery of the important local transport infrastructure developments is unjustifiably late in the process, eg:
- A43 Garlick's Arch is stated to be available in the first five years of the plan with 400 homes (0) and 6 Travelling Showpeople plots proposed: "There is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need", 2017 Sustainability Appraisal.
- A58 Land around Burnt Common warehouse, London Road, Send: Land Availability Assessment (2017 Addendum) page 15: "There is a realistic prospect that development will be delivered within the first five years of the Local Plan"; page 16 "Timescale 0-5 years".
- SRN 9 and SRN 10, new A3/A247 junctions are stated to be scheduled during the period 2021 to 2027. (Guildford Borough Transport Strategy 2017 page 22).

LRN7 Interventions to address potential highway performance issues resulting from the development at former Wisley Airfield site, including various mitigation schemes to address issues affecting Ripley High Street, A3 Ockham Interchange and M25/A3 Junction 10, are stated to be scheduled for likely delivery during the period 2021 to 2033. (Guildford Borough Transport Strategy 2017 page 23). It seems ridiculous that the Local Plan is based on developments A43 and A58 taking place or at least begun BEFORE the required improvements to major local transport networks. Unless the major road network improvements take place before the site developments, the Ripley/Send Marsh/Burntcommon/ Send/Clandon area will be subject to severe traffic congestion arising from the site developments with very limited access for the vast number of heavy vehicle journeys that will be required which will cause an absolute nightmare for traffic in these villages. It will make Portsmouth Road even more dangerous than it is already at its various junctions.

The addition of new A3/A247 junctions (A43a; SRN9, SRN10) will not help the area of these villages as it will encourage far more traffic to join/leave from the A3 via the A247 meaning much more traffic through Clandon, with its very narrow bends on the A247, and Send in particular, the latter making it more dangerous for pupils, parents and staff at Send Primary School and also more dangerous for both patients and staff at The Villages Medical Centre, as well as local residents and businesses in Send.

Although the draft Local Plan includes reference to the Highways England (HE) Proposed M25/A3 Junction 10 improvement it takes no account of the HE attention to close off access from the A3 northbound onto Wisley Lane, which includes access to RHS Wisley. The HE plan is to only have access to Wisley Lane from a slip road running parallel to A3 northbound, its only access being from the Ockham Interchange (Ockham/Ripley roundabout) which will only be accessible from the southbound A3, with NO ACCESS FROM THE NORTHBOUND A3. Although HE say that there will be signs on the northbound A3 advising drivers to go to the M25 junction roundabout, turn around and leave the A3 southbound at Ockham Interchange for Wisley/RHS Wisley, human nature being what it is most such drivers will leave the A3 northbound at London Road B2215 and drive through Burnt Common, Send Marsh and Ripley to get to Ockham Interchange for access to RHS Wisley. So every time an event takes place at RHS Wisley we can expect even worse traffic congestion through Burnt Common, Send Marsh and Ripley which makes the building of 400 homes at Garlick's Arch on Portsmouth Road even less appropriate, and Travelling Showpeople with heavy vehicles for fairground equipment an even bigger mistake. A43 Garlick's Arch should be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4334  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3. I object to site allocation A42 Clockbarn Nursery, Tannery Lane, Send as it is totally wrong to increase the number of planned homes from 45 to 60 when the total number of homes in the borough during the period of the plan has been calculated as 1,434 lower than the 2016 draft Local Plan. There is therefore no justification for an increase on this site.

7. I object to Site Allocation A42 Clockbarn Nursery, Tannery Lane, Send, as the delivery of all site allocations is contingent upon the delivery of new physical infrastructure (see Foreword extract above) whilst the plan does not include any Utility Infrastructure at all for A42: see 2017 Draft Local Plan Submission Appendix C INFRASTRUCTURE SCHEDULE pages 309-338 and, in particular 2 Utilities pages 320-325, which contains NOTHING in respect of A42 in respect of Electricity and Gas distribution and supply; Water supply; Wastewater connections and treatment; Flood risk reduction: surface water mitigation measures, so sufficient physical infrastructure for utilities is NOT planned for.

8. I object to Site Allocation A42 Clockbarn Nursery, Tannery Lane, Send, as the delivery of all site allocations, is contingent upon the delivery of new physical infrastructure (see Foreword extract above) whilst the plan does not include any Transport Infrastructure at all: see 2017 Draft Local Plan Submission Appendix C INFRASTRUCTURE SCHEDULE pages 309-338 and, in particular 1 Transport pages 310-316, which contains nothing specific to A42, just a vaguely worded LRN 20 Send Road/Send Barnes Lane (Send) traffic management and environmental improvement scheme which will do nothing to overcome the increased congestion in the narrow Tannery Lane arising from 60 new homes being built, an increase of 15 from 2016.

9. I object to Site Allocation A42 Clockbarn Nursery, Tannery Lane, Send as the delivery of all site allocations is contingent upon the delivery of new green infrastructure (see Foreword extract above) whilst the plan does not include any Green Infrastructure at all: see 2017 Draft Local Plan Submission Appendix C INFRASTRUCTURE SCHEDULE pages 309-338 and, in particular 3 Green Infrastructure pages 325-328, which contains NOTHING in respect of Clockbarn Nursery, Tannery Lane in respect of Green Infrastructure. To the contrary, the existing Green Infrastructure will be significantly reduced by the building of 60 new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4335  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site allocation A43 Garlick's Arch as it is totally wrong to increase the number of planned homes by the addition of Travelling Showpeople plots when the total number of homes in the borough during the period of the plan has been calculated as 1,434 lower than the 2016 draft Local Plan. There is therefore no justification for an increase on this site.

The Foreword on page 5 by Councillor Paul Spooner - Leader of the Council, includes the following in the fourth paragraph:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated I an is con tingent open the provision of new infrastructure, which is a key
theme of our Local Plan. The Council will work with infrastructure providers and developers to ensure that sufficient physical, social and green infrastructure is provided during the plan period”.

As the "delivery of sites allocated in this plan is contingent upon" the provision of new infrastructure is a change in the plan it can be commented upon and gives rise to the following objections, in conjunction with changes to site allocations

I object to Site Allocation A43 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley as the delivery of all site allocations is contingent upon the delivery of new physical infrastructure (see Foreword extract above) whilst the plan does not include any Utility Infrastructure at all for A43: see 2017 Draft Local Plan Submission Appendix C INFRASTRUCTURE SCHEDULE pages 309-338 and, in particular 2 Utilities pages 320-325, which contains NOTHING in respect of Garlick's Arch in respect of Electricity and Gas distribution and supply; Water supply; Wastewater connections and treatment; Flood risk reduction: surface water mitigation measures, so sufficient physical infrastructure for utilities is NOT planned for.

I object to Site Allocation A43 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley as the delivery of all site allocations is contingent upon the delivery of new green infrastructure (see Foreword extract above) whilst the plan does not include any Green Infrastructure at all for A43: see 2017 Draft Local Plan Submission Appendix C INFRASTRUCTURE SCHEDULE pages 309-338 and, in particular 3 Green Infrastructure pages 325-328, which contains NOTHING in respect of Garlick's Arch in respect of Green Infrastructure.

To the contrary, the existing Green Infrastructure at Garlick's Arch will be almost wholly taken away due to the planned wanton destruction of the current Ancient (some dating back to the 16th century) and other woodland.

I object to the addition to site allocation A43 Garlick's Arch of 6 Travelling Showpeople plots with associated storage facilities as this is wholly inappropriate in the rural environment of Send Marsh, Burnt Common, Send and Ripley within the Green Belt.

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch as this site allocation is outside the scope of the GBC 2017 Local Plan policy in respect of such sites which is as follows:

Point 4.2 Housing Policy, Policy H1 Homes for all, which begins on page 35 includes the following on page 36 under the heading Gypsy, Traveller and Travelling Showpeople pitches and plots:

(7) Accommodation for Gypsy, Traveller or Travelling Showpeople (whether they meet the Planning Policy for Traveller Sites definition or not) should be provided on development sites of 500 homes or more whilst there remains an identified need. Also page 40 "Gypsy, Traveller and Travelling Showpeople accommodation is required within development sites of 500 homes or more to help create sustainable, mixed use communities with suitable accommodation for all".

A43 Garlick's Arch is therefore OUTSIDE THE SCOPE OF THIS POLICY.

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch as the GBC 2017 Local Plan Policy for such plots (7) on page 36) shows that 6 pitches or plots should be provided for development sites of 1500 - 1999 homes and so A43 Garlick's Arch is totally outside the scope of this policy.

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch as there is no justification for locating in Send Marsh/Burnt Common 75% of the total of 8 such plots identified for the whole of the borough. I object to the inclusion of site allocation A43 Garlick's Arch in the 2017 Local Plan Submission as the main underlying reasons for adding this site to the plan in May 2016 are now defunct.

Supplementary Information provided to Councillors for the GBC Executive Meeting on 11 May 2016, at which A43 Garlick's Arch was very belatedly added to the 2016 Local Plan submission, included the following main reasons for its inclusion instead of the previous site allocation A74 Land around Burnt Common warehouse:

- The site location affords greater separation between Send Marsh/Burnt Common and the proposed site location at Gosden Hill Farm, Merrow Lane, Guildford.
The site provides the employment floorspace needed in the plan to meet identified needs.

As the maximum 7000 sq m industrial/warehousing floorspace included in A43 Garlick's Arch has now been removed from this site allocation in the 2017 Local Plan submission and moved back to the part of the Burnt Common area close to the previous A74 Land around Burnt Common warehouse, though changed to minimum of 7000 sq m, the above reasons used in 2016 to justify the inclusion of A43 Garlick's Arch in the Local Plan are no longer valid and so A43 Garlick's Arch should be totally removed from the 2017 Local Plan Submission, as well as any future variants that GBC may come up with.

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch as point 4.2.20 on page 40 says "National planning policy for Gypsy, Traveller and Travelling Showpeople is set out in the National Planning Policy Framework and Planning Policy for Traveller Sites and we will expect all new sites to meet the requirements of national policy. New pitches and plots should have adequate utility services and ...."

However, the plan does not include any Utility Infrastructure at all in respect of A43: see 2017 Draft Local Plan Submission Appendix C INFRASTRUCTURE SCHEDULE pages 309-338 and, in particular 2 Utilities pages 320-325, which contains NOTHING in respect of A43 in respect of Electricity and Gas distribution and supply; Water supply; Wastewater connections and treatment; Flood risk reduction : surface water mitigation measures, so "adequate utility services" as required for Travelling Showpeople plots by national Planning Policy for such plots have not been planned for. This is a further reason to remove these plots from A43 Garlick's Arch.

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch based on the Commentary on A43 Garlick's Arch, Send Marsh contained on page 75 of the 2017 Sustainability Appraisal, which says in respect of A43:

- Strategic Development Site

- There is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need.

This is a total contradiction as Policy S2 under 4.1.9 on page 29 includes "Larger Development sites, including the strategic development sites, will deliver the majority of new development in the 6-10 and 11-15 year periods of the plan". The Travelling Showpeople plots cannot be delivered both in the first five years of the plan and "in the 6-10 and 11-15 year periods of the plan".

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch as the only reason that the commentary in the 2017 Sustainability Appraisal includes "There is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need" is that the Sustainability Appraisal 2016 commentary on site allocation A46 Land to the south of Normandy and north of Flexford includes "There is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need" and this site allocation has been removed from the 2017 Draft Plan Submission whilst the area it covers is still there.

I can see no justification for the switch in the plan to A43, especially as A43 is outside the scope of the GBC policy in respect of Travelling Showpeople plots.

I object to the addition of 6 Travelling Showpeople plots to site allocation A43 Garlick's Arch as the Local Plan Submission 2017 shows a total need of 8 Travelling Showpeople plots in the borough during the period of the plan (see Policy S2 page 30 "We will identify 4 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites) within Guildford borough between 2017 and 2034. Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs we will seek to provide 41 permanent pitches for for Gypsies and Travellers and 4 permanent plots for Travelling showpeople who do not meet the definition". At the same time on the site allocation summaries on pages 142-145 Site Allocation A50 Whittles Drive, Normandy on page 145 shows Allocated uses Travelling Showpeople plots (suigeneris) and the column Gross number of homes (approx.) over the plan period shows 14, which is MORE than the total identified need of 8 for the borough and so meaning that that NONE are needed on site allocation A43 Garlick's Arch. The same figure 14 also appeared against A50 under Total number of homes (approx.) for Travelling Showpeople sites in the 2016 draft Local Plan, page 125.
I object to site allocation A43 Garlick's Arch as I strongly object to Requirement (10) under the heading Travelling Showpeople plots. "Following completion of the site and a further 18 months of marketing, if the site remains unsold, the future use of the land should have regards to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing" on the following grounds:

a. This "Requirement" is contingent on the Travelling Showpeople site remaining unsold but this should NOT be included in this site allocation in the first place as it is outside the scope of Council Policy on Travelling Showpeople plots.

b. It is totally wrong and unjustified to increase the number of planned homes on this site allocation when the total number of homes in the borough during the period of the plan has been calculated as 1,434 lower than the 2016 draft Local Plan. There is therefore no justification for any future increase on this site.

I object to site allocations A35 Wisley Airfield, A43 Garlick's Arch and A58 Land around Burnt Common as the scheduled delivery of the important local transport infrastructure developments is unjustifiably late in the process, e.g.

- A43 Garlick's Arch is stated to be available in the first five years of the plan with 400 homes (0) and 6 Travelling Showpeople plots proposed: "There is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need", 2017 Sustainability Appraisal.
- A58 Land around Burnt Common warehouse, London Road, Send: Land Availability Assessment (2017 Addendum) page 15: "There is a realistic prospect that development will be delivered within the first five years of the Local Plan"; page 16 "Timescale 0-5 years".
- SRN 9 and SRN 10, new A3/A247 junctions are stated to be scheduled during the period 2021 to 2027. (Guildford Borough Transport Strategy 2017 page 22).

LRN7 Interventions to address potential highway performance issues resulting from the development at former Wisley Airfield site, including various mitigation schemes to address issues affecting Ripley High Street, A3 Ockham Interchange and M25/A3 Junction 10, are stated to be scheduled for likely delivery during the period 2021 to 2033. (Guildford Borough Transport Strategy 2017 page 23).

It seems ridiculous that the Local Plan is based on developments A43 and A58 taking place or at least begun BEFORE the required improvements to major local transport networks. Unless the major road network improvements take place before the site developments, the Ripley/Send Marsh/Burnt Common/Send/Clandon area will be subject to severe traffic congestion arising from the site developments with very limited access for the vast number of heavy vehicle journeys that will be required which will cause an absolute nightmare for traffic in these villages. It will make Portsmouth Road even more dangerous than it is already at its various junctions.

The addition of new A3/A247 junctions (A43a; SRN9, SRN10) will not help the area of these villages as it will encourage far more traffic to join/leave from the A3 via the A247 meaning much more traffic through Clandon, with its very narrow bends on the A247, and Send in particular, the latter making it more dangerous for pupils, parents and staff at Send Primary School and also more dangerous for both patients and staff at The Villages Medical Centre, as well as local residents and businesses in Send.

Although the draft Local Plan includes reference to the Highways England (HE) Proposed M25/A3 Junction 10 improvement it takes no account of the HE intention to close off access from the A3 northbound onto Wisley Lane, which includes access to RHS Wisley. The HE plan is to only have access to Wisley Lane from a slip road running parallel to A3 northbound, its only access being from the Ockham Interchange (Ockham/Ripley roundabout) which will only be accessible from the southbound A3, with NO ACCESS FROM THE NORTHBOUND A3.

Although HE say that there will be signs on the northbound A3 advising drivers to go to the M25 junction roundabout, turn around and leave the A3 southbound at Ockham Interchange for RHS Wisley, human nature being what it is most such drivers will leave the A3 northbound at London Road B2215 and drive through Burnt Common, Send Marsh and Ripley to get to Ockham Interchange for access to RHS Wisley. So every time an event takes place at RHS Wisley we can expect even worse traffic congestion through Burnt Common, Send Marsh and Ripley which makes the building of 400 homes at Garlick's Arch on Portsmouth Road even less appropriate, and Travelling Showpeople with heavy vehicles for fairground equipment an even bigger mistake. A43 Garlick's Arch should be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
20.1 I object to site allocation A58 Land around Burnt Common warehouse, London Road, Send as there is no justification for changing the required industrial/warehousing space (Bic, B2 & 138) from a maximum of 7000 sq mt at A43 Garlick's Arch in the 2016 plan to a minimum of 7000 sq mt at A58 Burnt Common in the 2017 plan when the TOTAL requirement for Industrial Land (Bic, B2 & B8) has fallen from a range of 4.7 to 5.3 ha in the 2016 plan to a range of 3.7 to 4.1 ha in the 2017 plan (Policy S2: Planning for the borough - our spatial development strategy, point (1) page 30 and Policy E1: Meeting employment needs, table under point (1) page 71), a reduction of more than 20%.

21. I object to site allocation A58 Land around Burnt Common warehouse, London Road, Send as it appears to be a means of trying to establish this site allocation as being for future use for Waste Management activities which would be totally unsuitable for this area with many houses and families in the area. This is because "POLICY E1: Meeting employment needs (8) on page 71 is "When developed, new employment land at Burnt Common, together with the existing employment floorspace, will be treated as an Industrial Strategic Employment Site" and page 77 4.4.23a "plus 4.4.23a on page 77 (all in red): "Development involving waste management facilities may be appropriate and will be directed to the Industrial Strategic Employment Sites . . . . . . Some waste management activities fall within the industrial classes in the Use Classes Order and can be considered to be a Bic, B2 or B8 use. This is particularly the case given the increased move towards enclosing waste management activities in purpose-designed buildings". This is totally unjustified for inclusion in site allocation A58. I object to any possible use of site allocation A58 for Waste Management activities as residents are not provided with sufficient information for a full and proper Public Consultation under the terms of the Town & Country Planning Act.

22. I object to any possible future use of site allocation A58 Land around Burnt Common warehouse, London Road, Send for possible Waste Management activities as these would be totally unsuitable for the site and the local area. Any further need for Waste Management should be included in site allocation A24 Slyfield Area Regeneration Project which already includes Allocations (4) New council waste management depot (relocated on site), and (5) New or enhanced waste management facilities (including a waste transfer station and a community recycling centre). As Key Consideration (2) of A24 shows, liha of the site is allocated for Waste Management purposes in the Development Plan for the area (under Policy WD2of the SWP).

23. I object to site allocations A35 Wisley Airfield, A43 Garlick's Arch and A58 Land around Burnt Common as the scheduled delivery of the important local transport infrastructure developments is unjustifiably late in the process, eg: - A43 Garlick's Arch is stated to be available in the first five years of the plan with 400 homes (0) and 6 Travelling Showpeople plots proposed: "There is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need", 2017 Sustainability Appraisal. - A58 Land around Burnt Common warehouse, London Road, Send: Land Availability Assessment (2017 Addendum) page 15: "There is a realistic prospect that development will be delivered within the first five years of the Local Plan"; page 16 "Timescale 0-5 years". - SRN 9 and SRN 10, new A3/A247 junctions are stated to be scheduled during the period 2021 to 2027. (Guildford Borough Transport Strategy 2017 page 22).
LRN7 Interventions to address potential highway performance issues resulting from the development at former Wisley Airfield site, including various mitigation schemes to address issues affecting Ripley High Street, A3 Ockham Interchange and M25/A3 Junction 10, are stated to be scheduled for likely delivery during the period 2021 to 2033. (Guildford Borough Transport Strategy 2017 page 23). It seems ridiculous that the Local Plan is based on developments A43 and A58 taking place or at least begun BEFORE the required improvements to major local transport networks. Unless the major road network improvements take place before the site developments, the Ripley/Send Marsh/Burntcommon/Send/Clandon area will be subject to severe traffic congestion arising from the site developments with very limited access for the vast number of heavy vehicle journeys that will be required which will cause an absolute nightmare for traffic in these villages. It will make Portsmouth Road even more dangerous than it is already at its various junctions.

The addition of new A3/A247 junctions (A43a; SRN9, SRN10) will not help the area of these villages as it will encourage far more traffic to join/leave from the A3 via the A247 meaning much more traffic through Clandon, with its very narrow bends on the A247, and Send in particular, the latter making it more dangerous for pupils, parents and staff at Send Primary School and also more dangerous for both patients and staff at The Villages Medical Centre, as well as local residents and businesses in Send.

Although the draft Local Plan includes reference to the Highways England (HE) Proposed M25/A3 Junction 10 improvement it takes no account of the HE intention to close off access from the A3 northbound onto Wisley Lane, which includes access to RHS Wisley. The HE plan is to only have access to Wisley Lane from a slip road running parallel to A3 northbound, its only access being from the Ockham Interchange (Ockham/Ripley roundabout) which will only be accessible from the southbound A3, with NO ACCESS FROM THE NORTHBOUND A3. Although HE say that there will be signs on the northbound A3 advising drivers to go to the M25 junction roundabout, turn around and leave the A3 southbound at Ockham Interchange for Wisley/RHS Wisley, human nature being what it is most such drivers will leave the A3 northbound at London Road B2215 and drive through Burnt Common, Send Marsh and Ripley to get to Ockham Interchange for access to RHS Wisley. So every time an event takes place at RHS Wisley we can expect even worse traffic congestion through Burnt Common, Send Marsh and Ripley which makes the building of 400 homes at Garlick's Arch on Portsmouth Road even less appropriate, and Travelling Showpeople with heavy vehicles for fairground equipment an even bigger mistake. A43 Garlick's Arch should be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2722  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object wholeheartedly to the Guildford Borough Council Proposed Submission Local Plan 2017 as the information in respect of the total number of new homes required for the plan, perhaps the most important overall issue, is confusing, contradictory and, in some cases, misleading. For example:

   a. Point (1) of Policy 52 on page 30 says "During the plan period (2015-34) we will make provision for at least 12,426 new homes ...." This at least agrees with the Target figure for the number of new homes permitted and completed, under Monitoring Indicators on page 34 and the total of the Surrey Housing Market Assessment (SHMA) for Guildford.

   b. However, whilst 4.1.9a at the foot of page 30 says "The figures set out in the Annual Housing Target table (above on the same page) sum to a total of 12,426 homes" this is not correct. The figures in the Annual Housing Target table on page 30...
total 9,810, not 12,426. This causes confusion and is misleading. It appears to be because the Annual Housing Target table covers 15 years from 2019/2020 - 2033/2034. Dividing 9,810 by 15 (the number of years) gives an average of 654 pa, the same as the average for 19 years in the Guildford SHMA. The difference between 12,426 and 9,810 is 2,616 which presumably is the total for the 4 years 2015/2016 - 2018/2019 to agree with the total of 12,426 for the 19 year plan starting in 2015/2016. The figure of 2,616 for 4 years also represents an average of 654 pa. This contradicts the statement on page 31 of "a phased target that gradually increases over time ..." Although there is a gradual increase from 450 in 2019/2020 onwards, the figure of 450 represents a decrease of 31% from the average of 654 for the 4 earlier years of the plan. This is both misleading and very confusing.

c. The total for 2017 in the column Gross number of homes (approx.) over the plan period in the listings on pages 142-145 is 11,350, a totally different figure to the 12,426 found elsewhere with absolutely no explanation of the difference. The major reason for the difference seems to be that the figures quoted for site allocations A24, A25 and A26 in the listings are significantly lower than the total on the detail sheets for these site allocations/policies:

POLICY A24: Slyfield Area Regeneration Project, Guildford. "Approximately 1,500 homes of which 1,000 homes (C3) will be delivered within the plan period". The figure 1,500 is in red and so a change (an increase of 500) from the 1,000 which was the equivalent figure in the 2016 plan analysis. This is both very misleading and very confusing as the figure of 1,000 on page 143 is in black and shows no change, thereby hiding the overall increase of 500, with an apparent deferment of 500 beyond the plan period..

POLICY A25: Gosden Hill Farm, Merrow Road, Guildford. "Approximately 2,000 homes of which a minimum of 1,700 homes (0) will be delivered within the plan period ...". "Of which a minimum of 1,700 will be delivered within the plan period" is all in red and so a change from 2016, whereas page 143 shows 2,000 crossed out and replaced by 1,700. This is also very misleading and confusing as it makes it look as though there is a reduction of 300 from 2016 to 2017 whilst the overall figure is unchanged at 2,000, with an apparent deferment of 300 beyond 2033/2034.

POLICY A26: Blackwell Farm, Hogs Back, Guildford. "Approximately 1,800 homes of which a minimum of 1,500 homes (0) will be delivered within the plan period". 1,500 and the related text are in red so a change from 2016 and again what appears to be a deferment beyond 2033/2034 being made to look like a reduction in the total, which it isn't. There are also numerous instances of Gypsy & Traveller pitches and also Travelling Salespeople plots being omitted from pages 142-145 though the numbers are much smaller, totalling 38. I find all this unacceptable and so I object to the plan as a whole.

2. I object to the plan as a whole because of the unjustified focus of planned new homes in the Ripley! Send Marsh/ Burntcommon/Send area and localities as more than 40% of the total for the borough is within 3 miles of Send Marsh.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the housing number of: 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3123  Respondent: 15438753 / Peter Fairbrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

It is of great importance to all those who properly care about our much envied way of life and the quiet enjoyment we have of that life, is that those elected to protect the wishes & aspirations of said electorate, comply totally with all that they were elected to do – we have just witnessed what happens when even our elected government fails to realise what the majority of the electorate expect!

The fact: The people who put you there can take you away!

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6763  Respondent: 15438753 / Peter Fairbrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

*I would further object on the likelihood that such development in said or similar areas would eventually lead to the necessity of added facilities, amenities and infrastructure that could only serve in the destruction of our villages, rural areas and general way of life - envied by most of the rest of the world and thereby giving us one of the strongest tourist industries (and therefore large financial income) in Europe; damaging that would damage far more than just this borough’s income!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6764  Respondent: 15438753 / Peter Fairbrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. *The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. *The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. *The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

*I would further object on the likelihood that such development in said or similar areas would eventually lead to the necessity of added facilities, amenities and infrastructure that could only serve in the destruction of our villages, rural areas and general way of life - envied by most of the rest of the world and thereby giving us one of the strongest tourist
*industries (and therefore large financial income) in Europe; damaging that would damage far more than just this borough’s income!*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6761  
Respondent: 15438753 / Peter Fairbrass  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6765  
Respondent: 15438753 / Peter Fairbrass  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6760  Respondent: 15438753 / Peter Fairbrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6762  Respondent: 15438753 / Peter Fairbrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6793  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6794</th>
<th>Respondent: 15438945 / Jacqueline Davies</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D2 - Sustainable design, construction and energy

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6796  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6784  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E1 - Meeting employment needs

• The evidence base is unreliable;
• There is unclear differentiation between B class uses;
• Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
• Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
• The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E2 - Location for new employment floorspace

• It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
• I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6786</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E4 - Surrey Research Park

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY E7 Guildford Town Centre

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6791  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6792  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E9 - Local centres

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6776  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6777 | Respondent: 15438945 / Jacqueline Davies | Agent: |
|---------------------------|------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |

I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6778 | Respondent: 15438945 / Jacqueline Davies | Agent: |
|---------------------------|------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
I object to POLICY H3 – Rural Exception Homes

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6787  Respondent: 15438945 / Jacqueline Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY I4 Green and blue infrastructure

- Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.
- All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6779  Respondent: 15438945 / Jacqueline Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6780  
Respondent: 15438945 / Jacqueline Davies  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P2 – Green Belt

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to POLICY P4 – Flood risk and water source protection zones

• Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to POLICY P5 - Thames Basin Heath Special Protection Areas</td>
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</table>
| • Compensation mechanism too feeble to provide protection.  
  • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife). |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

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<th>Comment ID: PSLPP16/6772</th>
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<tr>
<td>I object to POLICY S1 – Presumption in favour of sustainable development</td>
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| • No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.  
  • No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.  
  • No statement of how economic, social and environmental impacts should be balanced.  
  • No reference to most of the NPPF Core Planning Principles. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
### Comment ID: PSLPP16/6775  Respondent: 15438945 / Jacqueline Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object to POLICY S2 –Borough Wide Strategy**

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPA16/1626  Respondent: 15438977 / William Stiff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Objections to Guildford Borough Council Proposed Local Plan (June 2016)**

**I object to the draft Local Plan for the following key reasons:**

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ig
2. I object to the removal of the Horsleys and the Former Wisley Airfield (FWA/TFM) from the Green Bel The later site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the Horsleys and FWA/TFM from the Green Belt.
3. I object to the housing number from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent .I understand that plan includes a figure which is almost 70% higher than the official national estimates for population growth in the Borough.
scale of this increase has alarming results for example an increase of up to 35% in existing West Horsley households - greater than any other single area in the Borough.

4. The infrastructure in the Horsleys and Ockham are already in overload. The local schools are full and the medical facilities are Drainage in inadequate and roads and car parks are overloaded with little or no scope for improvements.

5. I object to the disproportionate allocation of housing in the immediate localities of Ockham, Ripley, Send and the Horsleys.

6. I object to the threat the Local Plan poses to the historic rural villages of Ockham and the Horsleys and the blight on properties These are villages would change considerable with 2,000+ dwelling development at Wisley and the additional housing proposed on the Horsley sites.

7. I object to the detrimental impact on transport, local roads and road I specifically object to:
   1. The assertion that the Wisley development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of around 2,600 homes in the Horsleys and Ockham would result in an estimated 5,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the Wisley site would add additional congestion at the M25/ A3 junction as well as local roads.
   6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

8. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the FWA/TFM site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9. I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10. I object to the fact that the proposed plan does not meet the needs and desires of local communities.

11. I object to the continued inclusion of a site (the former Wisley Airfield,- now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPI) planning application was unanimously rejected by GBC on 8th April2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and Allocations A35,A36,A37, A38,A39, A40 and 41are removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our children cannot get into their local school as it is and the doctors surgery is so full on a daily basis you have to be dead or dying to get an appointment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6805  Respondent: 15439009 / Elisa Castle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm also disgusted to hear we could be removed from the green belt, which will then leave us open for more development in years to come.

Please accept this letter as a rejection against the plans for any development sites to go ahead in The Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6803  Respondent: 15439009 / Elisa Castle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wholly object to the volume of housing that is being planned, I fear the village does not have the infrastructure to support such development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016)

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1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the Wisley site would add additional congestion at the M25/A3 junction as well as local roads.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Development of over 2,000 house village at Ockham (former Wisley Airfield)

The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous.

The plan also includes extensive developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

• Major doubt concerning housing numbers

The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical model which is not revealed in the plan. Nor, apparently, to Guildford Borough Council, GBC.

This SHMA target housing number is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough.

The scale of this increase has alarming results e.g. an increase of up to 3 5% in existing West Horsley households - greater than any other single area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LP2016- P Darrell-smith.pdf (108 KB)
My objection is on the grounds that traffic in the area (particularly along the A323) is already bad particularly in rush hour, and an increase by more than 2400 houses will only worsen this congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6809</th>
<th>Respondent: 15439393 / Elise Clements</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reason we moved to this area was due to the Green Belt area, and these additional homes will virtually make one large new town between Aldershot and Guildford.

I don't believe sufficient plans have been made for infrastructure to support this increase, not only for traffic but also for vital services such as doctors and a hospital. Local surgeries are already under strain with waiting times of up to 2 weeks for non urgent appointments, this can only get worse. Issues with being able to park in Ash Vale to shop already demonstrate how quickly a trouble free trip to the shops can become a nightmare as it has been impossible to park on some occasions since the opening of the Co Op in place of Budgens, there will be far greater requirements for this type of shopping, and no plans for appropriate additional shops or parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1636</th>
<th>Respondent: 15439425 / Abigail Cruse</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1635  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

The Council will not publish the SHMA report so this figure cannot be verified? This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3130  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq. m proposed. That site was removed from the Plan without any reasoning?

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3131  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Garlick’s Arch is protected from development as Green Belt. There are **no exceptional circumstances** which allow for its removal from the Green Belt (Policy P2). Central Government states clearly that housing need is **not** an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/3129  **Respondent:** 15439425 / Abigail Cruse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/3139  **Respondent:** 15439425 / Abigail Cruse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6826  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6812  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These villages are currently severely congested throughout the day and parking in villages such as Ripley is already a real problem, further development in these villages will only result in more traffic and parking problems. The Plan does not provide an adequate or achievable strategy for improving capacity on these local roads which in many of the villages particularly Ripley Send and Clandon are narrow and only wide enough for one vehicle at a time. Additionally many of these narrow roads do not have pedestrian footpaths and are both totally unsuitable and extremely dangerous for pedestrians. Bringing an addition of some 5000 houses being proposed close to the village of Ripley will exasperate this already congested area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6828  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough and the Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are already at or close to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6831</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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The A3 or M25 would have to be considerably improved before any development is done. Highways England has confirmed that they have no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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</table>
The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object strongly to the proposals to remove the following villages from the Green Belt, Ripley, Send Clandon, Wisley Airfield (A35) and Garlicks Arch (A43) NPP states there needs to be exceptional circumstances for both Green Belt boundaries to be altered and development on Green Belt – these are not exceptional circumstances. These neighbouring villages will merge into one another as a result of the loss of this Green Belt resulting in urban sprawl and loss of the beautiful countryside.

This could be avoided at Garlicks Arch by developing on existing brownfield site just to the south of the site at Burnt Common where there is surplus land affording development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
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NPP states that local Plans need to take account of climate change over the longer term, including factors such as flood risk. The proposed site at Garlicks Arch (A43) is on the Environment Agency’s flood map as being in a flood zone 3 from a river meaning it has a 1 in 100 or greater chance of flooding each year – the HIGHEST risk category, however the site has been assessed as part of the Councils SFRA as a Flood Zone 2 which is between a 1% and 0.1% probability of river flooding annually. This site floods frequently during the winter months, clearly this site is not fit for purpose and needs to be accurately reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPP16/6813  Respondent: 15439425 / Abigail Cruse  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NPP states that the purpose of the planning system is to contribute to the achievement of sustainable development. This development of over 13,500 homes during the Plan period is not sustainable and will have a permanently detrimental impact by over development of villages in particular between Guildford and the M25 including Ripley, Send & Clandon. The services in these villages are not adequate to cope with the levels of development proposed and these developments do not meet with the needs of the local communities.

Garlicks Arch (A43) and Wisley Airfield (A35) are in unsustainable locations with a total lack of sustainable transport - bus services are infrequent and routes have been reduced, no railway stations within walking distance leaving residents reliant upon cars. There are no plans to improve the infrastructure for Garlicks Arch within the infrastructure plan and once again residents will be reliant on the car. These developments should be considered in areas such as Guildford where sustainable transport can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/6811  Respondent: 15439425 / Abigail Cruse  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan June 2016. The plan is not fit for purpose and unsustainable.

Please find my objection listed below to specific policies and matters within the Plan

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/6854  Respondent: 15439553 / R T P Hume  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register our strongest objection to the plan to remove part of the green belt near Guildford including the land round Chilworth, Shalford and Peasmash. The council were never elected to do this sort of urban vandalism and we sincerely hope the plan will be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1643  Respondent: 15439585 / Bryan Handcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Due to excess traffic my wife nearly lost her life at crossroads at end of Glaziers lane where it joins Aldershot road. The car which hit her was doing in excess of speed limit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6860  Respondent: 15439585 / Bryan Handcock  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<tr>
<td>Local roads are not suitable for heavy traffic</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The local roads are not suitable to cope with the amount of traffic hundreds of houses would generate.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
### Comment ID: SQLP16/1054  Respondent: 15439585 / Bryan Handcock  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

Local roads are not suitable for heavy traffic

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: SQLP16/1055  Respondent: 15439585 / Bryan Handcock  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

Local roads are not suitable for heavy traffic

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPA16/1646  Respondent: 15439777 / R.A.D. Donn  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Send village being removed from the Green Belt, this would be a broken pledge by councilors and politicians.

I object to the building of 40 houses and 2 travelers pitches at Send Hill, completely out of place in this rural area near the Cemetery.
I object to the building of houses at Clockbarn Nursery, Tannery Lane, again out of place, there is too much traffic on Tannery Lane now and difficult access to the main Send road, more building would only increase this problem.

I object to the building of 400 houses and 7,000 sq metres of industrial space at Garlick’s Arch, what a travesty to destroy this ancient woodland, another reason why we need to keep the Green Belt.

I object to a new interchange with the A3 at Burnt Common, already there is too much traffic, it is now quite rare to travel on the A3 north or south in this area without a hold up.

If any of the above is allowed to happen it will help to turn this area into an urban sprawl, with the added problems of school places, medical services, water, supply, waste and sewage disposal etc.

Would you please confirm that you have received this letter of objection to the Local Plan and that my comments are shown to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>PSLPP16/6880</td>
<td>15440065 / R Miller</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Infrastructure** - is already at breaking point. Years of infill have left our roads at bursting point and our schools overcrowded and unable to cope.

Further pressure will result in a deterioration of local services

> Development of surrounding areas - is not the answer.

No matter which new facilities are available to large developments, our roads, shops and services will come under tremendous pressure and once lost, will be lost forever

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

| Answer (if comment is on questions 1-7 of the questionnaire): () |
Travel - roads, buses and trains would be reduced to chaos if the proposed number of houses were to be granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6879  Respondent: 15440065 / R Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection and concerns for the proposed developments in the Horsleys. I am sure many have eloquently explained the problems we will face. However, I feel I must do the same. I could list many concerns but five or six I am sure, will suffice.

> Removal from the green belt - would be devastating for the way of life we currently enjoy; development would be rife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6882  Respondent: 15440065 / R Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My wife and I came to the Horsleys in the early 80s. We have stayed because everything gives a good and enjoyable way of life. More houses and in the numbers proposed could be cruel and only sanctioned by someone not living here.

I hope you find these few words helpful when deliberating our future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy A25 Gosden Hill and the development of 2000 houses, travellers pitches etc. The new proposed junction for the A3 to facilitate the development and the increased traffic would be excessive. Traffic through Send in both directions comes regularly to a standstill at this present time. It will be gridlocked, particularly in bad weather, if the proposed housing with its accompanying traffic goes ahead.

I stress the impact it will have on services including doctors and hospitals. The Royal Surrey A and E Dept struggles to cope at the moment. By increasing the weight of traffic on the A3 and the population around Guildford in general there will be dangerous implications for the lives of people. Without putting into place a huge increase in capacity of our NHS facilities before building thousands of new homes, the borough is being grossly negligent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2. I object to policy A43 Garlicks Arch and the building of 400 houses and industrial space and new road junction. Having been a resident of Send for 20 years and previously a teacher at the First School for 10 years, I am aware of the impact this would have on both the schools and traffic. Because of its proximity to the A3 and M25, there have always been recurring difficulties with congestion on the road through Send at peak times. Any incidents on major roads causes huge queues in the village. This has implications for people getting to work and school. When I taught at the school, it was not uncommon for children and staff to be delayed in reaching school following accidents. This would only be exacerbated by increasing the population in this area.

Additionally, I object to destruction of ancient woodland and the loss of natural habitats this would cause. I do see any disclosure of detailed calculations as to the number of new houses Guildford requires. This should be transparent before we consider using Green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3156  **Respondent:** 15440161 / Linda Daniell  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44 and the building of 40 homes and 2 travellers pitches. As a resident of Potters Lane, I have had first hand experience of the hazardous junction from Send Hill onto Potters Lane. Increasing the population will make this more dangerous. Visibility is very poor when turning right from Send Hill onto Potters Lane and more traffic will increase the risk to drivers lives. A44

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6884  **Respondent:** 15440161 / Linda Daniell  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the use of Green Belt land for building before other options have been fully explored. Surrey is an affluent county. Taken as a whole, there are swathes of land currently used for golf courses. The percentage of golf course land compared to other areas of Britain is excessive. The county and its borough councils should work to reduce these courses which benefit a small proportion of the general population and work for the greater good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3158  Respondent: 15440353 / Alison Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6887  Respondent: 15440353 / Alison Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)
There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6888  Respondent: 15440353 / Alison Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6885  Respondent: 15440353 / Alison Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1650  **Respondent:** 15440385 / Jane Donn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send village being removed from the green belt – We cannot let it be turned into a town.

No more industrial buildings – houses and traffic.

- I object to 45 houses at clockbarn nursery
- 400 houses and 7000 sq metres of industrial space at Garlick’s Arch
- 40 houses and 2 travellers pitches at Send Hill
- New interchange with the A3 at Burnt Common

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1652  **Respondent:** 15440449 / Ron Peponis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the send village being removed from the Green Belt. I was born to believe it was permanent. It keeps us separate from Woking/Ripley and Guildford.
2. I object to 45 houses at Clockbarn Nursery, tannery road is bad enough. I’m disabled so more traffic is disastrous.
3. I object to 400 houses and industry buildings at Garlick’s Arch as I live off Send Green – This is a natural beauty spot and will become a traffic shape up and pollution.
4. I object to 40 houses and 2 travellers pitches at Send Hill. It will cause traffic on a narrow road which was a beauty spot.
5. I object to the interchange at Burnt Common A3 at Send as where I live will become a rat run. It will leech proposed Wisley and Burpham. We need a free space. I have asthma and so does my wife and this traffic would cause pollution and grid lock.

Please don’t develop our Green Belt – we will become a rotten LA/USA what we have is precious.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3166  Respondent: 15440513 / Alexandra Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The wholesale development of 2,000 homes at Gosden Hill Farm, Merrow - Policy A25) in clear contravention of the central government's stated commitment for Green Belt protection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3164  Respondent: 15440513 / Alexandra Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Garlick's Arch (Policy A43) proposal to build 400 houses and 7,000 sq. metres of light/ general industrial/ storage distribution space on the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3165  Respondent: 15440513 / Alexandra Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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<td>The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A) at Burnt Common.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Policy A44. 1.9. ha land west of Winds Ridge and Send Hill designated for 4- homes and 2 travellers pitches. This has not been consulted upon. The subsoil contains documented unsafe landfill waste and the site is inappropriate due to the narrow country road, with insufficient access to the site.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<td><strong>I very strongly OBJECT to all of these plans and feel it goes completely against honouring your repeated election promises to protect the green belt!</strong></td>
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<td><strong>I would like all my comments to be seen by the inspector.</strong></td>
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<td><strong>Do the right thing and save Send and Ripley's hugely important Green Belt. I feel it is important to honour promises made and that this development Plan will cause a loss of trust by all residents. It will disrupt the idealistic village environment currently enjoyed and destroy the desirability to live in such an incredible area.</strong></td>
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</table>
Do not destroy the identity of our village.
Please act in the interests of the current residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6898  Respondent: 15440513 / Alexandra Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The enclosure of protected Green Belt land within the proposed new village boundaries (for there will be a presumption for development in the future).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6901  Respondent: 15440513 / Alexandra Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send should not be removed from the Green Belt as it is a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6897  Respondent: 15440513 / Alexandra Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3168  Respondent: 15440545 / Susan Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill Farm is in the Green Belt and as such you need to be able to show that there are 'exceptional circumstances to justify allocating green belt land for strategic development' and this you have not done.

Any development on Gosden Hill Farm will add thousands of additional vehicles onto an already over congested road system and your proposed solution is totally inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6904  Respondent: 15440545 / Susan Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Guildford is already a bottle neck on the A3 and the most logical solution is a tunnel such as that at Hindhead. It therefore follows that no new development should be allowed to take place until such a decision has been made so that land that will be needed for its construction is not used.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/6902</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object very strongly to the Guildford Borough Council’s Draft Local Plan June 2016 for the following reasons:-
There are no constraints to protect the character of the rural aspects of Guildford or its villages.

The vast planned development of homes is a disproportionate level of expansion making it unsustainable without the necessary infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/6911</th>
<th>Respondent: 15440609 / S Trower</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The proposed housing developments are at a much greater density than the existing housing. Current small scale developments have to be in keeping with the area & street scene, so why are new ones on such a higher density?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/6912</th>
<th>Respondent: 15440609 / S Trower</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What is needed in West Horsley are affordable homes. This was proven by The West Horsley Parish Council Housing survey and local plan in 2014. All new housing in the village seems to be 4 and 5 bedroom executive homes, usually following the demolition of a smaller home, which brings in a 2 (or more) car family placing extras strain on the village infrastructure. The WHPC survey indicated that there is little scope for older people to downsize, or for starter homes for children born and brought up in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6910  Respondent: 15440609 / S Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no proposed expansion of local facilities and infrastructure in line with the proposed addition to the total housing numbers. The village schools are full and there is no mention in the local plan about new schools to cater for the likely increased demand.

The roads in the Horsley’s are already very busy, very badly maintained, mostly unlit and with very poor drainage, which is in dire need of maintenance. There are blocked drains all over the village which have not been cleaned out in years – there is one in School Lane which is full of silt and has been for many years. The addition of more homes with drives and paved areas will only exacerbate the problem and result in greater water run off every time there is rain. Ripley Lane is impassable after any heavy rain, so how is more traffic in the area going to be able to use it?

The medical centre is in East Horsley and is already at capacity. There is a very limited bus service through the village on weekdays only and nothing at weekends. There is now no Newsagent or Post Office, and the only other village shop is due to close in the autumn. Existing residents must therefore use their cars to travel to East Horsley for the shops or railway station. This is without the massive increase in housing numbers planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6906  Respondent: 15440609 / S Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am writing to make a formal objection to the Guildford Local Plan 2016 under the public consultation.

The first line of Policy P2 states “we will continue to protect the Metropolitan Green Belt against inappropriate development” and then the policy goes on to totally change the green belt boundaries with a huge and unnecessary development within, so there is an initial and major contradiction in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6909  Respondent: 15440609 / S Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The alteration of the green belt is only allowed under “exceptional circumstances” and these have not been demonstrated in the plan – the inclusion of more housing to meet a vague and unproven need is not an exceptional circumstance – I therefore object to this alteration.

Additionally I object to the removal of West Horsley from the green belt by the extension of the 2003 Local Plan Settlement boundaries – there is no justification for this extension.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6908  Respondent: 15440609 / S Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is much use of the word sustainable in the local plan. A dictionary definition is “which conserves an ecological balance by avoiding depletion of natural resources or that can be sustained”. Once green belt land is built upon, how it can be sustained? The truth is it can’t – once the green belt is gone that is it – it will never be replaced. The recent referendum vote for Brexit from the EU must cast doubt on many of the assumptions made for population and employment forecasts. The consultation appears to be based on figures which have been kept secret from the public, so how can there be any transparency in the whole process?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to building 45 houses at Clockbarn Nursery because as you can see from my address, tannery lane is directly opposite Sandy Lane which at the moment is a complete traffic jam already, let alone another 45 plus cars joining this crossroads. I myself drive back home through tannery lane after picking my son up from nursery and find it very dangerous trying to drive across the road with all the park cars, if you think my son's life isn't important then so be it but your going to put people's lives in danger with this proposal. The road is so inadequate to accommodate this.

I request my comments are shown to the Planning Inspector.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6907  Respondent: 15440641 / Ben Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This email is to object to the following purposes made by Guildford council:

I OBJECT to Send Village being removed from the Green Belt, we moved to send because of its peaceful and tranquil surrounding. The green belt is there to protect villages like send from being over run on its small roads. If you remove this it will open the flood gates for developers to completely change what send is all about. Where is the special circumstances in which this could be justified?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6917  Respondent: 15440705 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed density of several hundred additional houses is not in keeping with the current semi-rural aspect of the village. It would be of interest to find out who will fill the additional homes proposed as there is no evidence within the Guildford plan to justify the need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6919  Respondent: 15440705 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Presumably developers will be required to subsidise a long-term bus service to service the needs of these additional residents as they attempt to travel to facilities (doctors, schools, shops, workplaces) outside of the village as the infrastructure in the village cannot support them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6921  Respondent: 15440705 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The one village shop in West Horsley may close when the current owners retire. The shop is small and as such has limited stock. There is also very little parking. Other ‘shops’ in the parade are a dentist and a chiropractor, neither of which ‘useful’ on a daily basis to the vast majority of the population of the village. The old post office shop as recently been converted into housing excluding any future ‘useful’ businesses to take occupancy. Residents of West Horsley regularly use the facilities (shops, library, doctors etc.) in East Horsley. The infrastructure, including parking in East Horsley is under increasing strain with the free parking behind Station Parade regularly being close to full.

The Raleigh school serves both East and West Horsley and is full every year with a waiting list. There are already village residents each year which are unable to secure a place. Additional housing will only exacerbate this situation. There are suggestions to relocate the school to increase places but these additional places do not account for the additional housing proposed.

Horsley does not have a secondary school meaning that places are already limited in number at the closest secondary - Howard of Effingham School. Other schools are not feasible for village children due to their distance from home.

There is suggestion that Horsley Medical Centre would be expanded. However it is already in need of expansion to serve the current community as appointments are hard to book, parking is limited. Will the Royal Surrey also be expanded to accommodate the additional 13,000 homes across the borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6915  Respondent: 15440705 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The village (West Horsley) does not have the infrastructure to sustain expansion to the degree that is suggested by the Guildford plan.

There is currently:

- One small village shop
- No post office
- No bank or cash machine
- No doctors surgery
- No secondary school
- Not enough state primary school places
- Limited bus service

Any development in West Horsley will therefore have a significant impact on the facilities (shops, doctors, station, parking) in East Horsley with is already stretched with the current size/population of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/6920  Respondent: 15440705 / Jane Martin  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Current village roads are not big enough or well enough made to sustain an increase in traffic. Each new household will most likely bring with it 2-3 cars as a necessity in this rural area. In addition to the 4-5000 additional cars that will come with the proposed development at Wisley Airfield. The impact of this on local roads is massive. Traffic already travels at dangerous speed (well about the 30 mph limit) along Ockham Road North, The Street and East Lane. An increase in traffic on the local roads will increase the danger to residents of all ages including the very young and elderly. It will also lessen the semi-rural nature of the village.

Horsley Station is already a busy commuter station 7 days per week. With most travellers travelling to the station by car the car park/waiting area/volume of traffic at peak times (London commuting and school times) will be unsustainable for East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Letter of Objection Regarding the Proposed Development for The Horsleys in the Guildford Borough Draft Local Plan**

As a life-long resident of the Horsleys, I am writing to object to various components of the Proposed Guildford Borough local plan as follows:

I fully oppose the removal of East and West Horsley from the Green Belt as well as oppose the insetting and extending the settlement area boundaries. There is no justification or reason as to why this should occur other than, in my opinion to allow the proposed additional and considerable building in a semi-rural area of outstanding natural beauty.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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There are currently areas susceptible to flooding during heavy rainfall (sustained or not). Additional building on open land will only increase the flooding risk to roads and houses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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In addition to all of the above the volume of new housing proposed for the Horsleys and surrounding villages including the proposal for Wisley airfield does not only seem inappropriate, unjustified and necessary but also seems to be well above the national estimates for population growth. Why is this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3201  Respondent: 15440801 / H.V. Newman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the local plan for Normandy for all the following reasons. Site A46

1. Normandy and Flexford are within the green belt. “exceptional circumstances” have not been approved by the inspectorate. The government’s pledge to safeguard the green belt is not being upheld.
2. The green belt status is given because of the open space surrounding the village which provides a buffer zone between ash and Guildford on either side, this would be lost if the development went ahead.
3. NPFF15 states :“early and meaningful engagement with neighbourhoods, local organisations is essential” – no one has consulted with us. It has come to light that Taylor Wimpey 2 years ago submitted plans for the development of this area to ABC Planning Policy. No word to the local council (Parish Council) was reported. The local residents were left in the dark, is this legal?
4. The size of the development proposed is out of all proportion to the area. A 1,500 place secondary school is not necessary this side of Guildford, as all schools do not have their full complement in the numbers of pupils that coned the allocated and most of the schools have room for expansion in the future.
5. Guildford borough council have skewed the data to suit their objective by combining Normandy and Flexford for the purpose of sustainability, but separated the two areas for the purpose of sensitivity so that it appears in favour of planning applications. The original data used in the first consultation identified Normandy as only one settlement. Rewritten in 2014 it was divided. Data surely cannot be changed for the convenience of planning.
6. Flood issues have not been considered by GBC, now those recognised on the environmental agencies flood alert map 3a and 3b, which disregards the “effective flood-plain” of 3b and will therefore place a severe impact on those areas identified in the SWMP.
7. There will be a threat to the Thames Basin Heath Special protection Area. There will be the erosion of ancient woodland and species of fauna and flora would suffer. A46 strategic site is situated within the protection zone of the TBHSPA, which contains an (SSSI) recognised as one of the key Natural 2000 European sites. The development of A46 will exacerbate all 5 threats which are:-
   1. Higher air pollution – excessive vehicle use and traffic fumes
   2. Human intrusion and disturbance due to lack of space around sensitive sites
   3. With increased numbers of dogs and cats
   4. There is no mention of a funding plan to protect any of these ancient sites
   5. There will be a fall out of species
7. Natural England states: “Special Areas of conservation are European designated and are afforded protection under the conservation of habitats and species regulations 2010” Together with these 2 bodies and the green belt stipulations and original promises of the government to safeguard the green belt, there should be no question of even building further in this area.
9. Normandy has twisted, narrow roads. There are traffic concerns due to the increased number of vehicles should this gross development go ahead. We have a restricted railway bridge in Westwood lane, which only allows simple file traffic. Beech Lane has no sight line at all on exit to the North to go through the bridge. There would be bottlenecks at this junction and accidents and increased pollution. In glaziers lane the road over the railway has poor sightlines and an angled at approach from both directions which is another source of safety concern. The Christmas Pie crossroads which is on a bend exits at the top of a use has already seen many accidents over the years, yet nothing has been done to deal with the problem. The B3000 from wanborough Hill thorough Puttealam Heath Road towards Godalming is already at a standstill at peak times the accumulated traffic would exacerbate the problem and lead to excessive gridlocking and wasted journey time.

10. I object to the destruction of the green belt, to the views which Normandy and the surrounding countryside enjoys, all this will be sacrificed which is a travesty of planning law. Policy D4 states that new development within village will have particular regard to important views of the village from the Surrey Hills during daylight and at night due to the light pollution, which has already increased with the addition of street lights which were never there when we first arrived.

11. The essential characteristics of the green belt all their openness and their pertinence! (NPPF) The proposed plans totally ignore this. GBC are ignoring past verdicts of planning inspectors who recognised the importance of their directions. Why is GBC ignoring them?

12. The following sites are being ignored which point to the special biodiversity in this area which will be fragmented and result in a loss of species. Wanborough and Normandy woods Site Nature Conservation importance (SNCI) A47. The paddocks (SNCI). GBC want to build on this site. The stream goes through it from the Hog’s Back and last year with the excessive rain we had to proposed land was under 3 foot of water this plot is a flood plain and should not be built on ever. Normandy Pond(SNCI) Normandy Common(SNCI) Wyke Churchyard(SNCI) – Flexford(SNCI) all these would be adversely affected by the building of the development proposed with lack of space for species to thrive. When we arrived here in 1968 there were swallows – I have not seen any in years, nor swifts or even the once common house sparrow has declined. Further declines is inevitable if we continue to sacrifice on countryside for urban sprawl.

13. I object to any change in Normandy and Flexford’s green belt boundaries. There are brownfield sites available around Guildford which would eliminate the need for destroying the local green spaces, the less expensive as infrastructure is available of gas, electricity, drainage etc. The closer to all services and provide houses nearer to the centre of town. Other local authorities apply constraints to their housing numbers. GBC do not. This proposal does not assess the needs of Normandy’s residents and the 100% increase in the number of houses suggested will destroy our natural, rural environment. The case has not been made for this destruction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With respect to the site numbered A44 in the revised draft local plan.

I would like to object to the inclusion of this site in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. This site was introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.
3. This development will add to the disproportionate burden on the north east of the Borough.
4. There is a question as to the suitability of the land for building purposes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6924  Respondent: 15440833 / Rhoda Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the sites numbered:

- A25 – Gosden Hill
- A43 and A43a - Land at Burnt Common – known as Garlick's Arch
- A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.
3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.
4. These developments place a disproportionate burden on the north east of the Borough.
5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.
6. Other infrastructure.
Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

7. Light and sound pollution.
The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society. It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.
If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.

8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.
It seems difficult to reconcile these two extreme positions.
If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3179  Respondent: 15440993 / Rebecca Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery due to inadequate access and traffic volume. Tannery Lane is far too narrow and twisty and with increased traffic this will make it very dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3181  Respondent: 15440993 / Rebecca Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to building 400 houses and 7000 sq metres of industrial space at GARLICKS Arch, opposite Send Marsh Road. The industrial site is not needed and the site floods and is covered by ancient woodland. Guildford housing requirements have been grossly exaggerated and refused to disclose their calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3182  Respondent: 15440993 / Rebecca Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send Road is already overloaded and increase in traffic from A3, M25, Woking and Guildford would become gridlocked with noise pollution levels increasing which are already very high. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3180  Respondent: 15440993 / Rebecca Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill. Due to the subsoil of the proposed site containing documented unsafe landfill waster registered at GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6944  Respondent: 15440993 / Rebecca Woods  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to send village being removed from the Green Belt. It was intended to be permanent as required by the National Planning Policy Framework and it is wrong and not justified to abandon it. Without the green belt there is no buffer between Woking and Guildford to prevent it becoming one conurbation. If the Green Belt is lifted there will be nothing to stop developer building and building until our lovely villages in the area are destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6946  Respondent: 15441025 / Angela Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have recently moved and paid a premium to be able to live in this lovely village surrounded by beautiful country side and impressive scenery.

We have escaped from an area within the M25 which, throughout the 20 years my family and I have lived there, has been constantly developed, causing more traffic on the roads ( and therefore more pollution ), over population, overcrowded spaces, over subscribed school, creating saturation, high density and increased CRIME rate.

At present, whenever I use the village facilities, I am just able to find a parking space in the main car park.

Finding a space to park at the doctor's surgery has been impossible most times even at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6947  Respondent: 15441025 / Angela Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The infrastructures in this area are NOT ADEQUATE to withstand more families and their needs, more crowds and more traffic on our roads.

The roads are not even repaired to cope for the present level of traffic, East Lane for instance is a disgrace.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6945  Respondent: 15441025 / Angela Batterbury  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident in West Horsley and I OBJECT to this village and surrounding areas being taken out of the Green Belt and subsequently houses and entire estates being built, changing completely the geography of the area.

I cannot see how more housing can be an option.

I STRONGLY OBJECT to Horsley being removed from the Green Belt and to the proposed planning developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6951  Respondent: 15441057 / Ruth Busby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reasons for my opposition are as follows

Expansion should be limited to protect character of town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reasons for my opposition are as follows

Concern over infrastructure, already known existing deficit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6952  Respondent: 15441057 / Ruth Busby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We should value the unique beauty of our market town and its surrounding areas. It is these green spaces that allow us as a community to thrive. It is wrong to deny future generations the same advantages.

Both the physical and mental health of the community will be impaired by such an outlandish and disproportionate level of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6948  Respondent: 15441057 / Ruth Busby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reasons for my opposition are as follows

Loss of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The evidence for expansion is exaggerated (GRA report on housing) and the consultation period has been limited

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
the provision of a local railway station is not cost effective unless there is a fast train service to London. If a fast train service does take place then this will increase road traffic congestion and create parking issues in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6958  
Respondent: 15441249 / Geoff Nicholson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 where Send Village would be removed (inset) from the Green Belt.

The intention of designating land as Green Belt is for it to permanently remain so, to prevent development on it, to provide protection for wildlife and countryside, and to provides buffers to prevent the creation of conurbations through the joining together of existing local communities.

To abandon Send’s designation of being Green Belt, flies in the face of all these intentions.

The National Planning Policy Framework requires that Green Belt remains so, and there are no justifications for removing Send’s designation as Green Belt that can be considered ‘special circumstances’.

Send must NOT become a Local Rural Centre.

Send MUST remain wholly Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLP16/6959  **Respondent:** 15441249 / Geoff Nicholson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing proposed in the local plan doubles the size of Burpham - this is not acceptable to the local community S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** SQLP16/1063  **Respondent:** 15441249 / Geoff Nicholson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The recent EU referendum vote will, in the future, withdraw the need for new build housing of this size - this requires an extension of the local plan consultation period

I understand that a decision is required on an A3 tunnel before Gosden Hill - the tunnel needs to be operational prior to any local plan decisions

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** PSLPA16/1659  **Respondent:** 15441409 / Robert E Beale  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
This letter responds to your invitation to comment on the above-named document, which I have studied with interest and care. I wrote to you in November 2013 about the previous Green Belt & Countryside Study/Local Plan Strategy Sites Issues & Options. The present document shows improvements to the earlier draft, (including the welcome dropping of the earlier proposed development at Lolesworth Wood, although this site has not been returned to the Green Belt, as it should be); but the new PSLP still contains proposals which many West Horsley residents, including myself, find completely unacceptable. First of these is the continuing proposal to inset virtually by the whole of West Horsley from the Green Belt. The view strongly expressed in our village is that this must not happen, and it is incomprehensible that neither the officers of Guildford Borough, (nor it appears the majority of our councillors) recognise this view (or prefer not to recognise it), since no attempt has been made to change that proposal.

My own views as to why this proposal remains unacceptable are as follows:

1. West Horsley (and also East Horsley - perhaps partly for other reasons - see further below) appears on the Guildford Borough Key Diagram (page 13 of the PSLP), as a sea of white (i.e. land no longer to be Green Belt) set in a larger sea of green representing remaining "countryside". The treatment of West Horsley in this way is clearly not in accordance with many of the requirements of the National Planning Policy Framework (NPPF), but in particular those of paragraph 83.

2. From the North part of West Horsley there are exceptional open views towards the Sheepleas (the nearest part of the Surrey Hills Area of Outstanding Natural Beauty - ANOB), as well from the ANOB towards the North into West Horsley. Clearly these much-prized views will be damaged by any significant development in any part of West Horsley. Further, the South part of West Horsley actually adjoins the ANOB and is indeed the main access point to the ANOB for the public on foot and by car from the North (at West Horsley church and Shere Road).

3. In particular, the new Strategic Development site A41 in the PSLP is objectionable in this regard, as its effect will be to destroy/ remove views to and from West Horsley, more than other Strategic Development sites proposed for the Horsleys.

4. Although reduced from the previously planned numbers, the current PSLP figures equate to 384 new houses in West Horsley, a rise of 35% compared to the existing 1,111 households in the village, and as I understand it, the new developments are scheduled to be implemented in the early years of the New Plan. Taken with the other development sites proposed for the Eastern side of the Borough, this is sure to put excessive pressure on local services including roads, and other infrastructure.

Turning to East Horsley's proposed development as a District Centre, this is beset by problems, particularly as regards the area of East Horsley Station Parade. Even today, this area has too little short-term and long-term parking, both at the railway station and increasingly for the local shops. Other services, particularly medical and educational, are also already over-burdened. Alone, the new housing developments proposed for both East and West Horsley in the PSLP would overload the proposed District Centre, but the possibility of a larger development at the Wisley Airfield site can only exacerbate this, since Horsley station would be the obvious (or only feasible) access point to the railway for London commuters (and other users) from Wisley. The proposed new Merrow station might attract residents of the proposed Gosden Hill Farm and I Send housing developments, but it will not help Wisley, and would, in any case, lead to increased overcrowding at later stations, given the likely limit to the additional train capacity which could be run on existing track; and because there are no proposals to develop the Effingham junction area (which is marginally closer to Wisley).

All in all it seems that the adoption of the current proposals in the PSLP for excessive housing concentration in the Eastern areas of the Borough of Guildford will lead, over a short time period to the complete destruction of the Green Belt in the Horsley areas, the overwhelming of services in general, and possibly to a major transport disaster. Please re-consider the...
PSLP proposals; specifically, reject Strategic Development Site A41; drop the proposal to indent West Horsley from the Green Belt, review the adoption of East Horsley as a District Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/1661  Respondent: 15441601 / B Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: GUILDFORD BOROUGH COUNCIL -LOCAL PLAN: STRATEGY AND SITES.

I write further to the publication of the above document and write to express my objection to elements of its contents.

My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have "urbanisation" implications far beyond those envisaged by the mantra that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

1. I object to your proposal to remove the Horsleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

2. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportunities. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

3. I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys and is completely out of keeping with their village. The proposal to build 180 houses in East Horsley and 411 in West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

4. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and drains. We have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

5. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally flawed. The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that...
there is to be no greater flood risk to anywhere. Surely by interfering with the flood plain in this location can only transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site doesn’t it become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

6. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to be. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council’s Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

7. I disagree with the Council’s housing projection of a need for 693 houses per year (identified in the SHMA) for the period 2013-2033 when an independent report prepared by NMSS for Guildford Resident’s Association in June 2016 identifies that the Objectively Assessed Housing Need is nearer to 510. This reinforces my view that the statistical basis for the draft Local Plan is fundamentally flawed.

8. I object to the Council’s failure to unlock the development potential of brownfield sites in the Borough and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of high amenity value.

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

2. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportunities. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

3. I object to the volume of housing, and associated density of construction, which is currently proposed in the 1-lorsleys and is completely out of keeping with their village status. The proposal to build 180 houses in East Horsley and 41 I in West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

4. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and drainage. We have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

5. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere else. Surely by interfering with the flood plain in this location can on ly transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site doesn't become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

6. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council’s Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

7. I disagree with the Council's housing projection of a need for 693 houses per year (identified in the SHMA) for the period 2013-2033 when an independent report prepared by N MSS for Guildford Resident’s Association in June 2016 identifies that the Objectively Assessed Housing Need is nearer to This reinforces my view that the statistical basis for the draft Local Plan is fundamentally flawed.

8. I object to the Council’s failure to unlock the development potential of brownfield sites in the Borough and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

I re-iterate my unreserved objection to the proposals as set out in the above document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3216  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce thus defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3210  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7022  **Respondent:** 15442049 / Ellouise Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7059  Respondent: 15442049 / Ellouise Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7064  Respondent: 15442049 / Ellouise Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/7002  Respondent:  15442049 / Ellouise Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7007  Respondent: 15442049 / Ellouise Fassom  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPP16/7014  Respondent: 15442049 / Ellouise Fassom  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPP16/7075  Respondent: 15442049 / Ellouise Fassom  Agent:
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7045  Respondent: 15442049 / Ellouise Fassom  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7049  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7028  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London.
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6996  Respondent: 15442049 / Ellouise Fassom  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6978</th>
<th>Respondent: 15442049 / Ellouise Fassom</th>
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<tbody>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6985  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared
with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in
the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<th>Respondent: 15442049 / Ellouise Fassom</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set.
   Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/1072  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1076  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1080  **Respondent:** 15442049 / Ellouise Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.
I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sq m of B use class floorspace to come forward. This figure comprises a net loss of 4,750sq m of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/627  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1669  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1673  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010–2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3212  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7060  **Respondent:** 15442081 / Lauren Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7066  **Respondent:** 15442081 / Lauren Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7003  Respondent: 15442081 / Lauren Fassom Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the location for new employment floorspace (Policy E2)</td>
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<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
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<tr>
<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
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<td>There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the loss of rural employment (Policy E5)</td>
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<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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| Comment ID: PSLPP16/7076 | Respondent: 15442081 / Lauren Fassom | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7056  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7046  Respondent: 15442081 / Lauren Fassom  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7070  Respondent: 15442081 / Lauren Fassom  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7029  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7041  Respondent: 15442081 / Lauren Fassom  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6991  Respondent: 15442081 / Lauren Fassom  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites. I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15442081 / Lauren Fassom</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk...
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6979  **Respondent:** 15442081 / Lauren Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6986  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared
with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in
the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/1068</th>
<th>Respondent: 15442081 / Lauren Fassom</th>
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<td>Document:</td>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/1073  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1077  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Cladon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Cladon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1081  Respondent: 15442081 / Lauren Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes
and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to
inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent
on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into
surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by
the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of
the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers
and central government.
I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1667  Respondent: 15442241 / Graham Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We would like to register our objection to the proposed New Local Plan. Fifty seven years ago, we moved to the lovely village of West Horsley and over the years have seen it grow, however, it has basically remained a village,

If the proposed developments go ahead, it will become a town, without the infrastructure to support it. If we had wanted to live in a town to raise our family, we would have done so,

It is of great concern to us that these developments will increase the population significantly and without due concern to the Green belt which was set up to prevent the spread of towns particularly around London,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3220  Respondent: 15442273 / John Michael Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.
**Comment ID:** PSLPP16/7084  **Respondent:** 15442337 / Thomas Poile  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I wish to most strongly object to Guildford Borough Council’s proposal to remove Green Belt Protection from a number of villages including Chilworth, Shalford and Peasmarsh. This would remove protection against development when the Council should be protecting the area and preserving the countryside for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3221  **Respondent:** 15442369 / Graham Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I wish to object to the 2016 draft local plan. I am a resident of New Inn Lane, Burpham, and believe the proposed Gosden Hill Farm development will have a significant adverse impact on the local area. My specific concerns are:

1. Road infrastructure is not sufficient to cope with the traffic that will result from the proposals. The roundabout outside the new Aldi store has demonstrated this point with the congestion caused on London Road and New Inn Lane from only a small increase in traffic volume, relative to that which will result from the proposals.
2. During the groundwork and construction phases of the development, the level of disruption within the area will be significant, with the roads becoming clogged as a result of deliveries, plant, and so forth. Pedestrian safety will be put at risk as roads are not designed to cope with such intensive usage.
3. Southbound traffic on the A3 is crawling most weekday evenings and the proposed development will only serve to increase these problems. The same is true for introducing junctions allowing southbound traffic to join and northbound traffic to exit the A3.
4. The development will ruin the dynamic of the local area, which currently provides for a friendly, village community, yet with all the amenities and transport links as a result of the close proximity with Guildford. This will be lost with the proposed urbanisation of the area.

5. The details concerning the proposal are extremely limited at this stage and residents have not been afforded sufficient information or time to fully consider the impact to the local area. For example:

6. There is no evidence to support that there is sufficient demand for the level of housing proposed. A significant oversupply of houses, which seems highly possible, would lead to instability in the local housing market.

7. There is no evidence to support the need for the proposed employment and retail provisions. Again, an under or over supply could affect the viability of the development.

8. It is unclear the purpose for the park & ride and new railway station. The railway station serves no purpose, being as close as it would be to both London Road and Clandon stations. The station would serve stopping services to London so would be of no benefit to a large proportion of commuters.

9. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

10. There appears to be little consideration of green space and public open spaces, despite considering the proposed development will result in the loss of a substantial proportion of green belt land in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a regular visitor to friends in West Horsley, I write to object strongly to the proposals, particularly to the destruction of large areas of Green Belt despite all the undertakings and assurances that they will be preserved except in very special circumstances.

West Horsley has kept its character as an attractive country village thanks mainly to the Green Belt around and within it. The areas of past development are mostly well separated, so that there are hardly any areas more than a few hundred yards from original woodland, fields, meadows or parkland. The plans propose a huge increase of over 1/3 in the number of homes in West Horsley.

Particularly inappropriate is the proposal to build 135 houses on the Manor Farm site (referenced Policy A38), good agricultural land in the Green Belt. It would bind together two existing areas of housing, causing continuous development for over 1 km between the Ockham Road and Long Reach.

Building 225 houses on the Manor Farm (referenced Policy A38) and East Lane sites (referenced Policy A41) in the Green Belt would greatly increase traffic on the narrow East Lane towards Horsley Station and the shops in East Horsley (West Horsley has only one small shop). East Lane is already heavily used despite being a narrow lane with a one-way section in it; it is frequently flooded and it has been in a VERY bad state of repair for many years, as has The Drift beyond it leading on to Effingham and the east.

As well as the roads, the drainage, medical facilities and schools in the area are all struggling to meet the existing demands on them, yet it seems that no consideration is given to any of these essential things in the Plan.

I believe that the Plan has ignored the existing character of the Village and the availability of facilities of all kinds and I strongly object to the Proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the building of 400 houses at Garlick’s Arch. These are not needed in Send or the borough and the proposal was announced at the last minute without any prior consultation.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch. It is not needed and there is already an available site at Slyfield where it can be built.

I object to the proposed development at Garlick’s Arch because the site is home to ancient woodland which should be conserved and it is also subject to flooding.

I object to the proposed development at Garlick’s Arch as it is part of the Green Belt and helps stop merging of towns and settlements. This is the main purpose of the Green Belt. I believe it needs to stay as such.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to a new interchange onto the A3 at Burnt Common because Send is already gridlocked daily at typical rush hour times and hasn’t the road infrastructure to cope with any more traffic.

I object to the proposed new interchange onto the A3 at Burnt Common because Send would then be used as a cut through to the A3 and the M25. Already Send Marsh Road is being used as a cut through to Ripley/A3 and is causing daily congestion at peak times. Very heavy traffic would cause daily chaos and bring the surrounding roads to a standstill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill as it contains unsafe land fill waste and is in the middle of the beautiful Green Belt which should be conserved. The road to this area is of single width and totally unsuitable for regular heavy traffic. A44

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the total ignorance of infrastructure requirements. Roads, medical facilities, schools etc. will not be adequate to cope. They are all at full capacity now.I1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the very large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will wipe out large areas of Green Belt and agricultural land. It would also prove to be catastrophic to the surrounding small roads, which would not be able to cope, and on the A3 and M25 interchange nearby. I3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to any building on the Green Belt in Send at Garlick’s Arch, Clockbarn Nurseries or Send Hill because there are no special circumstances to do so and the Green Belt is supposed to be permanent</td>
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<td>I object to all building on the Green Belt at Send, Ripley and Clandon because any called for development can be accommodated in Guildford’s brownfield areas much closer to existing transport facilities</td>
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<td>I object to the quoted housing need amount of 13,860 for the borough which is far too high.S2</td>
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<td>I object to expanding Send’s housing by over 25%. Objections were raised before and the number was reduced to from 435 to 185. It does not make any sense and goes against many people’s wishes to expand on this number once again.</td>
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<td>I would like my objections to be noted and the draft Local Plan (June 2016) amended</td>
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I object to all proposed sites in Send as they were not included in the previous consultation in 2014. Send residents have not been consulted on any of the new changes and all previous proposals have been considerably altered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3956  Respondent: 15442561 / Tegan Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

1. Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

2. Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3953  Respondent: 15442561 / Tegan Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn Nursery in Tannery Lane for the following reasons:

1. There has been an increase in proposed building of houses from 45 to 60 – this is ridiculously too many for our area.

2. This totally ignores hundreds of previous objections by local residents.

3. Access to Tannery Lane at the A247 junction is not viable for the amount of traffic that will be incurred.

4. Tannery Lane itself if not capable of being used by large or numerous vehicles – it is a Lane.

5. This will be eroding even more of the Green Belt.

6. There is already bad surface water flooding in this area. This can only increase the problem.
7. This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3952  **Respondent:** 15442561 / Tegan Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the Policy A43, land at Garlick’s Arch, Send Marsh for the following reasons:

1. This totally ignores hundreds of previous objections by local residents.
2. There are no ‘exceptional circumstances’ as required by the National Planning Policy to take this area out of the Green Belt.
3. This will remove ancient woodland which cannot ever by regained.
4. Ripley and Send villages will merge, therefore defeating the purpose of the Green Belt.
5. The number of homes proposed is excessive. Send is a village. This is over-development to the extreme.
6. The area is subject to frequent flooding and is currently a Flood Zone 2 allocation.
7. The excessive traffic that will be generated will totally cause mayhem on the Send and Ripley roads. Already whenever there is a road closure nearby or traffic accident (almost a daily occurrence on the A3/M25) in the vicinity – the main Ripley, Send Marsh and Send roads are ridiculously congested or at a total standstill.
8. There is no proven demand for Travelling Show people sites in this location. This development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
9. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3955  **Respondent:** 15442561 / Tegan Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the Policy A58, land at Burnt Common, London Road for the following reasons:

1. This was deleted from the 2014 draft plan because of all the objections previously made – therefore why has it been included again?
2. There has been a decline in demand for industrial land since the previous draft plant but the 2016 version uses the word ‘maximum’ a change from ‘minimum’ within it – this does not make sense.
3. There are already empty sites and units at Slyfield and Guildford and therefore no need to build new industrial and warehouse developments in our area. I can only envisage these will end up being empty too.
4. The 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares. This policy is a huge allocation of 10 hectares for Send alone. Totally unacceptable.
5. The small roads around this area are already often at gridlock. This can only make the problem worse.
6. The merging of existing villages (which will occur) defeats the purpose of the Green Belt.

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned in policy 4.423a and does not allow for full and proper consultation. This is unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The policy says: *Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.*

This means that the developer doesn’t even have to provide any ‘affordable’ homes, but just to make a negotiated payment to the Council. I doubt this is likely to result in the construction of any ‘affordable’ homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2023  Respondent: 15442561 / Tegan Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15)

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s removal from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1685  Respondent: 15442721 / Elizabeth Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of sites A36, A37, A38, A39, A40 & A41 in Horsley because:

- These sites are much too large in proportion to the size of East and West Horsley (additional 533 houses)
- These sites represent a disproportionately large amount of the borough's housing "needs"
- These sites are close to the proposed Wisley development and so together represent a vastly disproportionate development of the area.
- They would change to appearance of the green belt in and around Horsley which contradicts the council's aim of protecting the green belt
- The local roads and pavements are very narrow and increasing traffic both during and after construction would increase the risk of traffic accidents both involving cars and pedestrians many of whom are children.
- Considerable objection to these sites was made following the last draft plan by These objections should be considered and not just objections at this stage otherwise the Council could be accused of trying to "wear down" opinion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3241</th>
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I object to the development of site A35 near Wisley because:

- Of all the reasons raised during the recent planning application process and are too numerous to list but include building on the greenbelt, size, lack of facilities and traffic issues.
- The Council should not be revisiting issues already dealt with in detail by the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7125</th>
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I Object to development policy for inset villages because:

- There is already a method of achieving appropriate development in villages by the "washed over" status they have. As this works it should be retained and not removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7119  **Respondent:** 15442721 / Elizabeth Robson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to homes for all policy because:

- It is based on SHMA figures which lack all transparency and have not been submitted for review to local councillors

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7120  **Respondent:** 15442721 / Elizabeth Robson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the insetting of villages from the Green Belt because:

- The present "washed over" status should be maintained to prevent inappropriate development in villages
- Need to preserve village character which is part of the green belt and essential to it
- This policy contradicts the aims of P Spooner leader of the Council who wants to keep Guildford Borough very special and beautiful.
- This policy content contradicts the plan statement "We will continue to protect the green belt"
- East Horsley is a rural village with an attractive woodland character which enhances the local green It is an integral part of the green belt and development of East Horsley should not be considered separately from the surrounding green belt countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/7127  Respondent: 15442721 / Elizabeth Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the allocation of sites in the green belt for development purposes because:

• There has been no justification of exceptional circumstances which is required
• The green belt should be protected for all the people who live in the South East who derive benefit from visiting it and travelling through it. This is not NIMBYism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7094  Respondent: 15442721 / Elizabeth Robson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the presumption in favour of sustainable development:

• It does not take into account the particular characteristics of villages and rural areas with limited transport and services available
• The term is too subjective and unclear to represent a policy
• The primary policy should be to protect the Green belt as it currently is for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7117  Respondent: 15442721 / Elizabeth Robson  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I Object to the borough wide strategy because:

- There is insufficient justification to build over thirteen thousand homes.
- Lack of transparency in housing requirement projections
- Absence of exploration of brown field options
- Based on out of date assumptions ie pre Brexit
- The proposed development exceeds local demand and instead will satisfy demand from neighbouring and other boroughs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7112  Respondent: 15442753 / Anne Morgan  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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- **loss of the green belt** - the proposed insetting of East Horsley. If the green belt is constantly eroded, we are in danger of losing our countryside, which apart from being beautiful, is a resource for everyone, necessary for good physical and mental health and a vital resource to uplift the human spirit both now and for future generations. Once we have lost our countryside, it is lost for ever. This decision affects our children and our grandchildren. It is not selfish, inward-looking nimbyism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7113  Respondent: 15442753 / Anne Morgan  Agent:</th>
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</table>
- **number of new houses** - the density of new houses (double that approved in the 2003 local plan) is out of proportion to what the local amenities can manage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SSQLP16/1088  
**Respondent:** 15442753 / Anne Morgan  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **objected 2 years ago** When asked in 2014 if we approved of this plan, over 7,000 people wrote expressing their objections. We objected then, we are objecting now. Why are we not being listened to?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS163236  
**Respondent:** 15442785 / Tammy Hoar  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate heavy traffic. The lane cannot take anymore. The junction is too dangerous already and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS163237  
**Respondent:** 15442785 / Tammy Hoar  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I OBJECT to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate heavy traffic. The lane cannot take anymore. The junction is too dangerous already and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford's housing requirements have been shown to be grossly exaggerated and they have disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3239</th>
<th>Respondent: 15442785 / Tammy Hoar</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. THIS MUST BE AVOIDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3238</th>
<th>Respondent: 15442785 / Tammy Hoar</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside. For more detailed lines of objection, and a flyer specifically on this site, please contact Send Hill resident [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7118  Respondent: 15442785 / Tammy Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this renews on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/28  Respondent: 15442785 / Tammy Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt Policy 2 at paragraph 4.13.15 because:

1. Further contempt for the Green Belt by GBC.
2. Totally unsuitable access.
3. Destruction of an area used by so many people for relaxation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/315  Respondent: 15442785 / Tammy Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockburn in Tannery Lane because

1. It increases to 60 homes from 45.
2. It ignores the thousands of previous objections previously made by local people.
3. Traffic problems concerning Tannery Lane will worsen considerably.
4. Further contempt for the Green Belt and a history going back to Roman times.
5. Ridiculous promotion of building on an area that is frequently flooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/314  Respondent: 15442785 / Tammy Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because

1. It ignores the thousands of previous objections previously made by local people.
2. There is absolutely no proven demand for Travelling Showpeople at this location.
3. It will cause chaos where it accesses the Portsmouth Road.
4. It is ancient woodland and shows the contempt the GBC demonstrates for the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/316  Respondent: 15442785 / Tammy Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy A58 at Burnt Common because

1. There has been a decline in demand for Industrial land and there are empty sites in the area.
2. Impact on traffic at the Burnt Common roundabout will be enormous
3. Further contempt for the Green Belt by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C).

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the Plan depends. For each of the Key Allocated Sites in the Borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the SHMA figure of 693 houses per annum in the Borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS (a housing demographics consultant) has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the Borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the Borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result, any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need, the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly, in this regard, our objection to the allocation of Green Belt sites is twofold. First, I believe constraints should have been applied. Secondly, I believe the Council did not properly consider constraints and that their decision-making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt, then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead, the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt, then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.
Note the following accident data:

2010 – 2014 from Crashmap data:

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near Shell garage - Three vehicles collided causing delays Surrey Fire and Rescue

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Send Marsh Road - Motorcyclists with injuries airlifted to hospital

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and Surrey County Council (SCC) is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Green Belt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday Book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council may have been attracted by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the Plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding should be available for it. (One of the reasons for turning down the so-called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running South past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement - often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for Southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The addition of North facing ramps to the A3 at Burnt Common would have serious repercussions for local communities. There is no requirement for local traffic to access the A3 to the North, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the East of Guildford (Merrow etc.) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas, as the traffic would be on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7137  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the Borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7146  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
15. POLICY D3

I OBJECT to Policy D3 - Historic environment.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which leaves plenty of scope for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7147  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages.

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7134  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1).

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is an alternative brownfield site very close by.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7135  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2).

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7136  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7149  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment or “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the Plan’s explicit priorities should be:

1. To protect the Borough’s prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre.

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.
There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7143  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. POLICY H1

I OBJECT to Policy H1 – Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free-up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the Plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to...
accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility, and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the Plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of over £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy.

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances”. The wording of the policy is far too wide, so compromising all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no facility to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the Plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development, then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances”. The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow: wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever more popular past-time, particularly at weekends when hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road traffic accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring additional accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The Borough’s infrastructure is already heavily strained. However the Plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problems, which will get
worse as development proceeds. The schemes referred to in this Policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this Plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the Plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the Borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This Plan, however, assumes infrastructure will follow the needs of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of Community Infrastructure Levy (CIL) income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to, capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision for increased capacity of Guildford's hospitals: where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7142  Respondent: 15442913 / Inger Scotland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the North East of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built-up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7132  Respondent: 15442913 / Inger Scotland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the Borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. It appears that the Plan has fallen into the developers’ hands, and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the Plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the Borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused a lot of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. Mere housing need does not constitute a ‘special circumstance’, so there are no exceptional circumstances for these sites and villages to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The proposed development in these villages will result in the character of these villages being lost and the countryside encroached.

Guidford Borough Council's (GBC’s) Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development: however, other considerations (e.g. traffic congestion) should preclude the use of this site also.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan states that in accordance with national planning practice guidance, the Level 1 Strategic Flood Risk Assessment (SFRA) has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the National Planning Practice Guidance (NPPG)) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7130  Respondent: 15442913 / Inger Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The National Planning Policy Framework (NPPF) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision- taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to rely on motor vehicles. These sites are also unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

My main objections to the Local Plan are on the grounds of the large increase in traffic that is bound to ensue through the village of West Clandon, and to object also because of the consequent destruction of Green Belt lands. The detailed comments below on the paragraphs within the Local Plan have been prepared by others, but nevertheless accurately and succinctly reflect my own views, and are therefore largely unaltered.

Traffic in West Clandon is significant in off-peak times, and becomes congested for most of the peak traffic times, with frequent tail-backs from the Clandon Road/Portsmouth Road roundabout (A246/B2215) to the West Clandon/Guildford Road cross-roads (A246/A247). As the present Clandon Road (A247) cannot cope with peak traffic demands, and any significant improvement in traffic handling on that road would require many houses in the village to be removed and house frontages drastically reduced, so any proposed significant increase in traffic would appear to be the result of inadequate or
negligent planning. You will be aware that as recently as 12.07.16 there was yet another traffic accident in the village, this time involving two cars. As a pedestrian walking on the narrow pavements (which are sited on only one side of the road, there being insufficient space for pavements on both sides) I frequently see vehicle debris lying at the road side, presumably as a result of vehicles side-swiping one another on the narrow road. I also not unusually have to have my car mount the pavement in order to pass on-coming wide vehicles (or for them to have to do so).

You should also be aware that traffic congestion in Guildford usually results in congestion on the A3 and A246 leading into Guildford, which then causes severe congestion on the A247 through West Clandon, presumably as traffic on the other two routes tries to find alternative routes. The proposed housing developments in the Gosden Hill and Garlick Arch areas would only result in grid-lock through the village.

West Clandon and the villages and amenity areas around it constitute at present pleasant and peaceful semi-rural habitation. The proposed housing changes would evidently change all of that, resulting in a quasi-urban environment which is not what the local peoples wish for. I understand that there may be a need for increased housing, but would question whether that should be done at the cost of destroying much of the quality of life of existing residents. There are other areas where such developments could be done without such consequences.

My detailed objections are listed below.

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016). In my opinion the Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to impose constraints on development, primarily due to the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt, demand for housing is, in practical terms, unlimited. Accordingly in considering the housing number, the Plan should take into account that in this part of London's commuter belt, availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionate greater than 5% is undesirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be reasonable. A substantially lower number, on the hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number, the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to
have deliberately been skewed towards growth without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites, and through increasing the housing density of existing built-up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is therefore unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

24.A.Question 1: The evidence base and submission documents

"The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?"

ANSWER
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set.
   Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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24.B.Question 2: Legal Compliance

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case."

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by over 20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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24.C.Question 3: Soundness

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case."

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.

1. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

2. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

3. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

4. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

5. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

6. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

7. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

8. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for

9. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy

10. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

11. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include electricity grid supply problems and sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

12. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

13. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

1. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

2. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

3. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

4. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites given priority over commercial development and greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.D.Question 4: Duty to cooperate

"Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the "

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above planning for the following reasons:

- Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- It's a disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- Object to the threat of the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3245  Respondent: 15443009 / Robert Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object fundamentally to this developer led Plan in regard to Site 46 – Normandy/Flexford.

It should be very obvious under serious scrutiny that there is a total lack of supportive infrastructure.

The two Lanes forming part of the boundary of Site 46 – Westwood Lane/Wanborough Hill and Glaziers Lane - could in no way not cope with the substantial increase in traffic, and neither could the third boundary road – the A323 Guildford/Aldershot road – which is already heavily utilised. Any sensible person would immediately understand that it is completely impossible to envisage any "highways improvements" that would enable these narrow roads to cope.

Additionally, this is an environmentally sensitive location in close proximation to the Thames Basin Heaths Special Protection Area with many vitally important ecological networks and habitats.

The proposed development would destroy these and through the pollution generated – through light, litter, noise, diffuse land and road runoff - would without doubt negatively affect the known green infrastructure corridors, the ancient woodland, stream habitats, Normandy Common, Normandy Pond, and also Wyke Churchyard.

Historically, it is a well known fact that, the area is already prone to flooding. The proposed development would without doubt create a disaster at some stage.

This developer led Plan majors on an intimated need for a new secondary school for the western parishes. This is a completely incorrect assertion.

The schools serving the western parishes are currently well undersubscribed and there are apparently in excess of some 730 vacancies.

Additionally it is understood that the SCC has already approved expansions at the County School, Guildford and St. Peters. Also in 2018, a new technical college is to open that will provide a further 480 places.

QED there is absolutely no need for the school on which the developer bases this proposed Plan.
In view of all the above facts this Plan should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12686  Respondent: 15443041 / Tony Moreton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I read of a suggestion to remove chilworth and surrounding villages from the green belt. I have lived in chilworth most of my life and knowing the area well I object strongly to any idea of this change.

Please add me to a list of which I'm sure I will be one of many who share this view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1686  Respondent: 15443073 / Oliver Potter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to object to the local plan for West Horsley. The scale and density proposed is incredible and needs to be urgently amended. The country has just voted for brexit, to a large extent, to curb migration and population growth. It would be awful to build over such beautiful land on the pretences of population forecasts set before Brexit. Without migration our natural birth rate will lead to a shrinking population. Once you build on the greenbelt like this you never get it back.

The density of housing proposed is significantly higher than existing housing. We need suitable family housing to support swathes of young people unable to buy family houses. Familys dont want to live in shoeboxes. Prices can come down if supply and demand balance changes, that is how to make houses affordable rather than building small houses nobody wants.
The local school is already full. What is the plan for that? The station car park already full, what is the plan for that? The peak time trains for London are already full with people standing all the way to London, what is the plan for that? The A3 junction with the M25 is gridlock at morning and afternoon peak, what is the plan for that?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3250  Respondent: 15443105 / Jane Holman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Wisley air field being developed with over 2000 new homes. It is too many in a very small village of outstanding natural beauty and green belt.

I object to housing as the roads surrounding Ockham are narrow and already have too much traffic cutting through grin the A3 & M25 junction 10.

I object also as there are no secondary schools that could cater for more children than it already does and certainly not hundreds as it could be. It is extremely difficult to get into - The Howard of Effingham, the nearest to Ockham.

I am a regular visitor to the village where I have parents living there, I hope this is stopped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3251  Respondent: 15443137 / Andy Clements  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Lastly in respect of Policy A46 there is nothing in the local plan which gives any evidence of 'exceptional circumstances' to justify the release of site A46 from the Green Belt. So why does there need to be development in this area instead of other locations around the borough?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7151  Respondent: 15443137 / Andy Clements  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objection is on the grounds that traffic in the area (particularly along the A323) is already bad particularly in rush hour, and an increase by more than 2400 houses will only worsen this congestion.

The reason we moved to this area was due to the Green Belt area, and these additional homes will virtually make one large new town between Aldershot and Guildford. I don't believe sufficient plans have been made for infrastructure to support this increase, not only for traffic but also for vital services such as doctors and hospital. Local surgeries are already under strain with waiting times of up to 2 weeks for non urgent appointments, this can only get worse. Issues with being able to park in Ash Vale to shop already demonstrate how quickly a trouble free trip to the shops can become a nightmare as it has been impossible to park on some occasions since the opening of the Co Op in place of Budgens, there will be far greater requirements for this type of shopping, and no plans for appropriate additional shops or parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3252  Respondent: 15443201 / St Josephs Catholic Primary School (Michael Stokes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A19: Land at Westway, off Aldershot Road, Guildford.

The Governing Body of StJoseph's Catholic Primary School,Guildford,would like to comment on the proposed site allocation for approximately 38 homes (C3).

We would like to state that we have no objections to this land being used for housing, as we are very aware that homes, especially affordable family homes, are needed in Guildford.
However, we would like to point out some key considerations applicable to this site:

1) Traffic movement - there have been two serious accidents outside of the school in recent months.

2) Parking - there is very little parking available in the vicinity of the school, leading to dangerous and anti-social parking in the local streets. We believe that generous parking facilities should be available for residents and their visitors on this site.

Both of the above are, of course, a major safety concern for us.

3) The school has recently extended to a three term entry and further expansion on our site is not possible. With pupil numbers at 631, the school is over PAN, and oversubscribed, as are all local primary schools. Planning for additional school places should be taken into consideration.

4) The site boundary runs the full length of the school boundary. Consideration should be given to height and density, with 'overlooking' issues relating to School Consideration should be given to height and density, with 'overlooking' issues relating to School and Play areas - Policy H1: Homes for all, and Policy 01: Making better places - Residential development of 25 dwellings.

5) The school has a plot on the Westborough Allotment which is used every week and is much valued by the children and the school. Continued safe and easy access is paramount. With respect to rights and easements and the right to park, the spaces allocated for users of the allotments is essential, as they provide an important mentoring role for our children.

We would expect the drainage ditch to be maintained as part of any planning approval.

We would like to request that the concerns that the school has in respect of this unusual site be taken into consideration at the outset of the planning process, that they be added to the Key Considerations, and that they be kept on record for when a planning brief is prepared.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the plans at Garlicks Arch. It would ruin the whole area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3263  Respondent: 15443265 / C Knaggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new interchange area. Already too much congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3262  Respondent: 15443265 / C Knaggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the plans for Send Hill. Have lived there for over forty years. Already far too much traffic.

I object to noise and dust.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/7165  **Respondent:** 15443265 / C Knaggs  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1) I object to Send being removed from Green Belt. To remain a village not to become a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7188  **Respondent:** 15443361 / G Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Object**

Over 80% of Guildford borough land is situated in the Green Belt and the Proposed Submission Local Plan (LP) housing numbers fail to take into account allowable constraints on new builds in the borough, caused by the green belt. Due to such a high housing target, over the plan period, the only way such large housing numbers can be accommodated is by taking too much land out of the Green Belt. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints based on the high proportion of Green Belt in the borough. Effingham Parish Council objects to the housing target - it is too high.

In addition, it is necessary to review the Strategic Housing Market Availability Assessment (SHMAA) concerning:

1. The part of the housing target driven by economic growth. Is this housing target still appropriate for the borough following the referendum result and the expected slower growth in the future? Given that an average of 125 new builds per year are due to economic growth this figure needs reviewing.

1. Whether student figures for the University of Surrey are still appropriate? Following the referendum result student numbers at the university are expected to decline as students from Europe are now expected to have to pay the full fees. Russell Group universities are predicting a decline in student numbers from Europe in the future due to the higher fees.

1. EPC regards the 14% housing buffer to be higher than necessary and should be reduced. The 14% buffer is forcing GBC to identify sites in the green belt that would not be needed if there were no, or a lower, buffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Local Plan (2016)

It would appear that Guildford Council have not listened to the comments previously made by many people criticising the 2014 draft local plan and have swept all these comments under the carpet as if they did not exist. They have now proceeded with the new GBC local plan as if nothing had happened.

Any new developments should be in keeping with the character of the two villages and within the present existing boundaries of East and West Horsley.

By moving the village boundaries - a very sneaky way of land grabbing, will in no way enhance the character of the existing villages. The infrastructure in the area is already struggling and would be unable to cope with the volume of traffic which would be increased by the proposed Local Plan Strategy.

The local infrastructure will need to be improved to meet the present needs of an expanding population as a result of any new developments.

With the proposal of over 500 houses in East and West Horsley, with the majority in West Horsley, there have been no proposals for a new primary school in the area despite the fact the Raleigh School cannot now cope with current demand for school places.

Also no thought seems to have been given that infrastructures such as health - no commitment for a new doctor's surgery, education, transport. The roads around the Horsleys are already at breaking point.

If the proposal for over 2,000 houses at the Wisley development proceeds the roads around the Horsley's would certainly be unable to cope with all the additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3271  Respondent: 15445665 / Jonathan Hewlett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Be The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3271  Respondent: 15445665 / Jonathan Hewlett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open space Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
11) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7194  Respondent: 15445665 / Jonathan Hewlett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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6) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17711  Respondent: 15445665 / Jonathan Hewlett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to the lack of proper infrastructure planning for sites (Policy II)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development envisaged in the plan. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the huge scale of development envisaged in the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7195</th>
<th>Respondent: 15445665 / Jonathan Hewlett</th>
<th>Agent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transpo The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7197</th>
<th>Respondent: 15445665 / Jonathan Hewlett</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7192  Respondent: 15445665 / Jonathan Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1)  
2) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7196  Respondent: 15445665 / Jonathan Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNIC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7193  Respondent: 15445665 / Jonathan Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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5) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1698  Respondent: 15445697 / Jane Mary Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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6. I would have hoped more facts about how the Council arrived at the number of houses required would have been more constructive but the Council appears not to be willing to be honest and open.

I OBJECT to the 2016 Draft Local Plan. I urge you to withdraw it and stop trying to force new development against the wishes of local residents and in a lot of cases common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3272  Respondent: 15445697 / Jane Mary Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
5. Shortly before this Local Plan was published Guildford Borough Council totally rejected the application to redevelop Wisley Airfield, yet here it is again. The current proposal would destroy the village of Ockham. In effect the proposal is for a New Town with houses and blocks of flats packed close together on a density scale more appropriate to an inner London borough and the site is largely Green Belt. This development would increase the number of vehicles needing to park at Horsley Station and Effingham Junction which are already full to capacity most days.

I OBJECT to the intense use of this largely Green Belt land for housing units, the insetting of the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
| 2. I object to the removal of East and West Horsley from the Green Belt with no demonstration of 'exceptional circumstances'

What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| Comment ID: PSLPP16/7200  Respondent: 15445697 / Jane Mary Hall  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| 3. I object to the East Horsley village being inset rather than washed over as this would permit even more development whilst doing nothing to improve the roads/lanes or providing more schools places both junior and Senior. The movement of the boundaries within East Horsley would allow building on Kingston Meadow beside the Village Hall which is an important recreational space within the village. The cars would be using an already dangerous junction with Ockham Rd North, the shops and Station Approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| Comment ID: PSLPP16/7201  Respondent: 15445697 / Jane Mary Hall  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
4. Removal of open land and replacing it with hard landscape will make flooding more of a problem.

I OBJECT to the destruction of the Green Belt without evidence of need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the development at Send Hill because of the narrow lanes and single access country roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7203  Respondent: 15445729 / Daren Aris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of school places for all the new proposed houses.
I OBJECT to the lack of doctors surgeries in the area that are already stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7202  Respondent: 15445729 / Daren Aris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send village being removed from the Green Belt, there are no special circumstances to justify it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/1700  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1701  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3277  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/7228</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7226  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7227  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7235  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7229  **Respondent:** 15445793 / Jackie Withers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7231  **Respondent:** 15445793 / Jackie Withers  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to poor air quality concerns (Policy P3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7224  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7217  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7219  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1702</th>
<th>Respondent: 15445921 / Andrew Martin</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the Draft Guildford Local Plan for The Horsleys

I am writing to object to various components of the proposed Guildford Borough local plan with regards to the Horsleys as follows:

I oppose the removal of East and West Horsley from the Green Belt as well as oppose the insetting and extending the settlement area boundaries and associated building of several hundred new houses on field and woodland in this village in an area of outstanding natural beauty.

I oppose the extent of the developments proposed on the basis that the volumes of houses are well above the requirement to support population increases, nationally and in the surrounding area.

East and West Horsley do not have the infrastructure to support the current village population let alone several hundred additional homes in the villages. The situation is as follows:

- One small village shop serving all of West Horsley with residents having to travel (mostly by car) to East Horsley
- No post office following its closure in recent years
- No bank or cash machine
- No doctors surgery as such the overstretched East Horsley Medical Centre is utilised where appointments at short and long notice are hard to come by
- No secondary school as such the oversubscribed Howard of Effingham School is the preferred school for the villages. There is no suggestion of a reasonable alternative to the Howard should housing across Guildford and Mole Valley increase as the county and borough councils would like
- Not enough state primary school places. The Raleigh School is already oversubscribed on an annual basis with village children missing out each year.
- Limited bus service
- Limited volume of passengers able to travel from Horsley Station (car park is often full on weekdays as it is without the additional traffic from additional households and thousands of new homes at Wisley.
- Increased risk of flooding due to the development of fields and woodland

Village roads cannot support an increase in traffic from several hundred new homes and those at Wisley. There are already issues with speed and volume of traffic as well as the quality of the roads

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent:</th>
<th>15445985 / Richard Humphreys</th>
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I am writing to state my objection to the removal of the former Wisley airfield site from the green belt.

Although I live in Cobham I commute to Ockham on a daily basis for work.

The local roads and lanes could not cope with the proposed increase in traffic, let alone the A3 and M25 which is already gridlocked on a daily basis.

2000 homes in such a rural area would also have a devastating impact on local residents.

The nearest shopping to the proposed development is in Cobham which has local parking issues and a further possible 4000 vehicles added to this would on result in chaos.

There are also areas of SSI surrounding the site which would be hugely impacted by the increase of family pets from such a number of houses. [cats and dogs etc]

There must be a number of Brownfield sites in and around Guildford that should be considered for development before destroying our precious Greenbelt that once gone can never be replaced.

It would also increase the tendency for urban sprawl. How long before Surrey becomes part of London?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/7269  
Respondent: 15446145 / Nigel & Jane Simpson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: we object to the insetting of villages (meaning in fact removal of the villages from greenbelt protection) and the fact that they will suffer from higher density development and the resulting increase in traffic, use of infrastructure etc, which is already under pressure. We object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on greenbelt openness and the views in and out of the area of natural beauty and indirect contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7267  
Respondent: 15446145 / Nigel & Jane Simpson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. We are particularly concerned about the winding narrow and dangerous route via the A247 through West Clandon which also results in vehicles using a cut through along the even narrower rural road. Ripley Road, through East Clandon from the A3. The Ripley Road is already dangerous and there are potentially many conflicts between vehicles, pedestrians and bicycles, particularly as this is on the Surrey Hills cycle route. The dramatic increase in houses in the area will only exacerbate the problem and we can for-see serious consequences, possibly resulting in injury or death as a result of the increased use. We would hope that the Borough would be held to account if this occurs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/7257</th>
<th>Respondent: 15446145 / Nigel &amp; Jane Simpson</th>
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1. We object to the settlement boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2, para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the greenbelt, the views in and out of the area of natural beauty (protection of the AONB Policy P1) and the character of our village.

2. Policy P2 - greenbelt: we object to the significant erosion of the greenbelt with the proposals for large towns being developed on greenbelt land thereby removing the openness of the greenbelt. We note in particular the large developments proposed for the north east quadrant of the Borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide dormitory facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracks in the Horsleys and Garlick’s Arch at Send.

4. Further with regard to the erosion of greenbelt, we object that Policy P2 is not met where it states that greenbelt should be protected. We object to the disproportionate use of greenbelt land for housing -some 65% of the housing proposed is on greenbelt and with little consideration being given to redevelopment of brownfield sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/7262</th>
<th>Respondent: 15446145 / Nigel &amp; Jane Simpson</th>
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1. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand. Congestion on the A3 in particular, but also other A roads in the area such as the A247 and the A246. There is already an overcrowded and slow train system for those living in the Borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

1. Continuing the S1 Policy (presumption in favour of sustainable development), we object that this is not being met and that Guildford Borough Council are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools etc, in our immediate area (other than roads and rail already mentioned above) to service us. If Guildford Borough Council were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hopeful goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? There are many examples of developers reneging on commitments as funds dry up, even though very high profits will be made as a result of agricultural and greenbelt land being sold for valuable housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7248  Respondent: 15446145 / Nigel & Jane Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We, Nigel and Jane Simpson of the above address, object to the 2016 draft Local Plan as a whole and, in particular. We object to the specific issues listed below. We believe that this Local Plan is severely flawed and will have a direct and serious detrimental effect on the amenity currently enjoyed by ourselves and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. The proposals in the Plan will seriously erode the openness of the greenbelt and endanger the beauty and views in and out of the Surrey Hills Area of Natural Beauty.

Our specific objections are:

We object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes and we object on two grounds:

The proposed housing numbers have been imposed on us with no proper consultation being undertaken with the residents of East Clandon and the Borough as a whole. Secondly, the housing numbers are based on a high growth economic development plan which in itself has had no consultation with us and this. Combined with estimated demand from London residents. will turn Guildford into a dormitory town for London.

Further, we object to the fact that no real economic or housing demand factors have been provided by the Borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF's requirements for the Planning Authority to provide meaningful consultation.

1. We object to the fact that Guildford Borough Council have not met the requirements of the NPPF paragraph 155, which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a
number of areas by Guildford Borough Council. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon. There is also the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

We demand that there should be a significant challenge to the Guildford Borough Council scenario including planning, housing and growth numbers, which should be revised and especially in the light of uncertainty and changes which will accompany Britain’s withdrawal from the European Union.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1098  Respondent: 15446273 / Jane Stevens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1099  Respondent: 15446273 / Jane Stevens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1100  Respondent: 15446273 / Jane Stevens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I support site allocation policy A57. This site allocation is supported by draft Local Plan Policy H1: homes for all, sections 4.2.21, 4.2.22 and 4.2.29

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7256  Respondent: 15446305 / Mo Adda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the amount of traffic that will generate on Burpham’s area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7254  Respondent: 15446305 / Mo Adda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I utterly object to the 2016 draft local plan for many reasons: the loss of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7255  Respondent: 15446305 / Mo Adda  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

disproportionate level of development in the area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1104  Respondent: 15446305 / Mo Adda  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I utterly object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1105  Respondent: 15446305 / Mo Adda  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, I ask GBC to revise the housing number, and to amend the Local Plan to utilise brownfield/previously used land rather than green field sites – of which there are significant amounts of the former within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1705  Respondent: 15446401 / Louise Yandle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

Answer (if comment is on questions 1-7 of the questionnaire): () 

I object to the housing number of 693 houses per year from West Surrey Strategic Market Housing Assessment which is far too high. 

What changes (2016)/further amendments (2017) do you suggest should be made to the document? 

Attached documents: 

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Comment ID: PSLPA16/3158  Respondent: 15446401 / Louise Yandle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) 

Answer (if comment is on questions 1-7 of the questionnaire): () 

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41: 

- Amount of new housing far exceeds local need. 
- Housing density excessive when compared with existing development. 
- Would transform the Horsleys into a sizable town, something for which no case is made. 
- No local support. 
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites. 
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt. 
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding. 
- No account taken of additional impact of Wisley Airfield site on Horsleys. 
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”. 
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on. 
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”. 
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6753   Respondent: 15446401 / Louise Yandle   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:
• No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.
I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:
• Amount of new housing far exceeds local need.
• Housing density excessive when compared with existing development.
• Would transform the Horsleys into a sizable town, something for which no case is made.
• No local support.
• Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
• Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
• Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3290   Respondent: 15446401 / Louise Yandle   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I object to the removal of the former Wisley Airfield from the Green Belt. The site is important in protecting against urban sprawl from London and if built on, will mean an urban corridor from London to Guildford. There are no circumstances whatsoever that warrant removing this land from the Metropolitan Green Belt.

I object to the continued inclusion of the side known as Three Farm Meadows when the planning application has been unanimously rejected by Guildford Borough Council's planning committee. Serious concerns about the site have also been raised by authoritative sources across the UK including Highways England, Thames Water, NATS and the Environment Agency.

I trust these objections will be fully considered and the former Wisley Airfield (Three Farms Meadows) Allocation A35 is removed from Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6277  **Respondent:** 15446401 / Louise Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th><strong>Comment ID:</strong> PSLPP16/14376  <strong>Respondent:</strong> 15446401 / Louise Yandle  <strong>Agent:</strong></th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<tr>
<td><strong>I OBJECT TO POLICY D1 (BETTER PLACES):</strong></td>
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<tr>
<td>• Poor monitoring.</td>
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<tr>
<td>• No force given to vernacular or historic design guidelines.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
</tr>
<tr>
<td><strong>I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):</strong></td>
</tr>
<tr>
<td>• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<tr>
<td><strong>I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):</strong></td>
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<tr>
<td>• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and ‘Disneyfying’ public historic assets.</td>
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<tr>
<td>• Doesn’t ban development near historic assets.</td>
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<tr>
<td>• Ignores NPPF 126, 131, 132, 133.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13073</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT TO POLICY E1 (EMPLOYMENT):
• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/14367 | Respondent: 15446401 / Louise Yandle | Agent: |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E1 (EMPLOYMENT):
• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14368  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14369  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):
• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14370 Respondent: 15446401 / Louise Yandle Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY):
• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
• Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
• Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14371 Respondent: 15446401 / Louise Yandle Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):
• Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets
bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14372</th>
<th>Respondent: 15446401 / Louise Yandle</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT TO POLICY E7 (TOWN CENTRE):
• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT TO POLICY E8 (DISTRICT CENTRES):
• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14374  **Respondent:** 15446401 / Louise Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT TO POLICY E9 (LOCAL CENTRES):
- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14358  **Respondent:** 15446401 / Louise Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):
- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/14359  **Respondent:** 15446401 / Louise Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14360  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14379  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)
• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once
thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14380  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):
• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14381  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):
• Just a list of generic measures, not related to real life or the particularities of Guildford.
• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods, i.e. most residents!
• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14382  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
• No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7259  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes over 70% of new housing is built within green belt. There is enough brownfield land to be built on so no need to build on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14361  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P2 (GREEN BELT):
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14362  Respondent: 15446401 / Louise Yandle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 ( )
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7260  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14357  Respondent: 15446401 / Louise Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the
Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses
the Council want to build, taking all the constraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much
too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no
reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of
all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a
corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Firstly the idea to remove the Green Belt I am particularly unhappy about, this will mean us losing all green areas and we will have no countryside left, which is so important for the environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/7268  Respondent: 15446433 / Gavin knight  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the amount of houses which are being planned, I understand that additional houses have to be built but the quantity that are being planned in our area is unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/3292  Respondent: 15446465 / Claudette Keane  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

My name is Claudette Keane I am a resident at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I am writing to register my objection to the proposed developments on Keens Lane and its surroundings.

Should the need for this development be reviewed in the light of the Brexit vote.
Why use GREEN BELT land when its gone its gone.
The proximity to Whitmore common adversely affects wild life.
Keens Lane is too narrow to widen.
What will happen to the 16th century property on the north side of the road.
The traffic in this area is a nightmare at rush hours.
The drainage and sewerage services currently in place cannot cope when there is heavy rain.
Sime close gets flooded every time there is heavy rain.
Parking is a nightmare, we are forced to drive on the wrong side of the road as people have no where except on the main road.
Current essential service’s such as Gas, Electric, Schools, Hospitals doctor’s etc. are at breaking point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3293  Respondent: 15446561 / Peter Hoar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery. Some of the planning papers presented to the public were written by a company who had obviously never visited the site. Their descriptions of the roads and access were figments of their imagination as much of Tannery lane is too narrow for two cars to pass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3294  Respondent: 15446561 / Peter Hoar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the building of 400 houses and 7000 sq metres of industrial spaces at Garlicks Arch. Access to the Portsmouth Rd is difficult at times, this development would make it almost impossible. Again we see proposed elimination of Green Belt and ancient woodlands. Soon we will see ribbon development all the way to central London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3296  Respondent: 15446561 / Peter Hoar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to a new interchange with the A3 at Burnt Common. It is extremely difficult to access Send Road and the Portsmouth Road in the early morning and evening closing times. With the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 at Blackwell Farm, Send faces gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3295  Respondent: 15446561 / Peter Hoar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the development of 40 houses and 2 travellers’ pitches at Send Hill. Again planners seem to have no conception of the local roads ans it would again precious Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7270  Respondent: 15446561 / Peter Hoar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send village being removed from the Green Belt. This is in direct conflict of clear election promises made by both local and central governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/29  Respondent: 15446561 / Peter Hoar  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt Policy 2 at paragraph 4.13.15 because

1. Further contempt for the Green Belt by GBC.
2. Totally unsuitable access.
3. Destruction of an area used by so many people for relaxation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/318  Respondent: 15446561 / Peter Hoar  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockburn in Tannery Lane because

1. It increases to 60 homes from 45.
2. It ignores the thousands of previous objections previously made by local people.
3. Traffic problems concerning Tannery Lane will worsen considerably.
4. Further contempt for the Green Belt and a history going back to Roman times.
5. Ridiculous promotion of building on an area that is frequently flooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/317  Respondent: 15446561 / Peter Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because

1. It ignores the thousands of previous objections previously made by local people.
2. There is absolutely no proven demand for Travelling Showpeople at this location.
3. It will cause chaos where it accesses the Portsmouth Road.
4. It is ancient woodland and shows the contempt the GBC demonstrates for the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/319  Respondent: 15446561 / Peter Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because

1. There has been a decline in demand for Industrial land and there are empty sites in the area.
2. Impact on traffic at the Burnt Common roundabout will be enormous.
3. Further contempt for the Green Belt by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1707  Respondent: 15446593 / Helen Dare  Agent:
I object to the proposed development in the Horsleys.

* Overcrowding of junior and secondary schools in the local areas and not enough teachers for the present ones.
* Doctors surgery not large enough and the doctors are already stretched with attending to patients.
* Not enough car parking spaces in the village.
* Sewage drains will be unable to cope with extra effluence.
* Station car park unable to cope with extra cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7272  Respondent: 15446625 / Robert Moseley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools:

I understand that the schools in West Horsley have no spare capacity to deal with increased demand for places. The present proposals will lead to a large increase in demand for places at the local schools. How do you propose to deal with that? Is there a proposed building programme for schools in the area? I don’t believe there is. So the inevitable solution will be ‘temporary’ classrooms installed on school sites. As a former County Councillor in Warwickshire and a governor of many schools there I know from experience that ‘temporary’ classrooms have a great tendency to become permanent classrooms as the budget never seems to be able to accommodate a proper building programme for schools. This sells short the children, the teachers and parents who deserve to have satisfactory conditions in which the children are educated. I therefore object to the proposals on these grounds

As a relatively recent newcomer to Surrey from the Midlands I have always been impressed by the environment in the County and particularly in the villages of Surrey. These proposals would alter the nature of the village and the way of life enjoyed by villagers in negative way and I object to that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/7273  **Respondent:** 15446625 / Robert Moseley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Roads:

The roads that will be used by the proposed houses simply will not cope with increased traffic. They barely cope with the traffic during morning and evening rush hours already. The staggered junction across Ockham Road North from the end of East Lane across to the Drift will simply be grid-locked and pose an ever greater danger to the children who cross that junction on their way to and from school.

At present the road surfaces are inadequately maintained and are riddled with pot-holes. The surface of East Lane near to the junction with Ockham Road is a disgrace. This problem can only get worse with an increase in traffic such as that proposed. As the budget for road maintenance seems to be inadequate to deal with present problems where are the necessary added resources to come from if these proposals are accepted? I therefore object to the proposals on these grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3306  **Respondent:** 15446689 / James Eric Barr  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to the building of 400 houses and 7000sq. metres of industrial space at Garlick's Arch, the site of ancient woodland. There are already industrial estates elsewhere with space to develop and the roads through Send and Ripley are choked with traffic morning and late afternoon now without adding to the misery. To us it would be sensible to have northbound access to the A3 at Burnt Common to reduce the amount of traffic travelling through Ripley village to get to the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7276  **Respondent:** 15446689 / James Eric Barr  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My husband and I wish to object to the removal of Send and Ripley from the Green Belt. There are no exceptional reasons for doing so and going forward there would then be no safeguards to stop a large conurbation replacing distinct and separate villages/communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/680  Respondent: 15446689 / James Eric Barr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Policy A42 change at Tannery Lane because increasing the number of homes from 45 to 60 will worsen access and traffic problems in Tannery Lane and at the A247 junction, it is an erosion of the Green Belt and will impact open countryside views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/683  Respondent: 15446689 / James Eric Barr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Policy A43 change at Garlick's Arch because it ignores the thousands of previous objections, the provision of 8 Travelling Showpeople plots is out of proportion, the number of houses is excessive and will cause the loss of ancient woodland, might exacerbate flooding in the area and will generate excessive traffic on roads and villages which cannot cope with the present volume of traffic at peak times. We are retired so don't travel to work during rush hour but if we have a doctor's appointment the volume of traffic has a significant impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID:  pslp172/684</th>
<th>Respondent:  15446689 / James Eric Barr</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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We object to Policy A58 at Burnt Common, London Road because it was deleted from the 2014 draft because of the amount of objections, the word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land, there is no need to build industrial or warehouse development in the Green Belt when Slyfield and Guildford still have empty sites and industrial units, the proposal is a huge over allocation of 10 hectares although the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, even more traffic would be using small surrounding roads which can't cope with present traffic volumes. Besides causing gridlock all this overdevelopment will obviously contribute to a worsening of air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:  PSLPA16/1710</th>
<th>Respondent:  15446753 / David Boyce</th>
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13. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
14. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
11. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2) and therefore GBC is acting outside their terms of reference.

The Plan states the preference is to make the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of this habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3319  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Glandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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6. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; and it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

7. I object due to the congestion that the development will cause to the local village road. (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends and hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater traffic being generated from these developments, there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
8. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I am not confident that the planning of the infrastructure requirements and the delivery of projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7287  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
10. I object to poor air quality concerns (Policy P13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7281  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt There are no exceptional circumstances for these villages and the land to be taken from the Green Belt, once taken from the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.
Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7282  
Respondent: 15446753 / David Boyce  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk and that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7279  
Respondent: 15446753 / David Boyce  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to particular policies and issues within the Plan.

1. I object to the Local Plan as the proposed development will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable as it will have a permanent and detrimental impact on the existing local community particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The services in these villages will be unable to cope with the level of development and the proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations as they do not benefit from railway stations within easy walking distance and bus services are inadequate. Residents will have to rely on cars. These sites are unsuitable due to the lack of public transport. There are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. GBC should consider increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy has been ill considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey and suggests a very irresponsible and cavalier approach has been implemented and this will need examined in detail to understand how this could have happened.

It is clear that the strategy adopted in the Plan is out of balance, and disproportionate with development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being
allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will significantly impact on the surrounding local villages. They will have a permanent detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3103  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3102  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3105  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3095  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

1. I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **The Plan is self-inconsistent in respect of traveller sites.**

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3100  
**Respondent:** 15446753 / David Boyce  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch**

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

*The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”*

*The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3104  
**Respondent:** 15446753 / David Boyce  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1418  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1417  Respondent: 15446753 / David Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3311  Respondent: 15447585 / Lionel and Maureen Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy Numbers A27’A28,A29,A46 because of loss of countryside in Ash and Tongham loss of green belt in Normandy, more congestion not enough parking facilities at local shops more demand for services at doctors and hospitals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3312  Respondent: 15447649 / Becky Woodcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident in Flexford (Normandy) and have recently been made aware of the new building plans that have been proposed for the lane in between Glaziers Lane and Westwood Lane.

I fully object to these plans.

My main reason for objection is that there is absolutely no need for any schools in our area. Ash Manor School and Kings College are both undersubscribed, these schools should be aiming to get in more pupils. Why build a new school in the middle of both of these schools and have another undersubscribed one? After speaking to many of my neighbours, most of which have young children in between the ages of 5 and 13, none of them are pleased with the idea of the school. They didn’t choose to live in an area like Normandy because they knew it was going to have a new school built there. They moved there to be away from the hustle and bustle.
Why build new homes on two roads called ‘Lane’? We have the traffic from the A31 and A3 to deal with already, and people cutting through Flexford to get to the Aldershot Road. The roads are unable to take the traffic. It’s unfair on the residents already living in the area, choosing to live here for peace and quiet from the big stores, schools and major traffic, to then be put in the middle of it all because of 1100 new homes.

In conclusion, I object to the proposal of new homes and a school in Normandy.

Thank you for your time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>15447681 / Malcolm Hughes</th>
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I live in Cobham. The level of traffic on the main Cobham roads has increased dramatically over the past few years. If we are to add 2000 more houses then the impact to Cobham will be horrendous.

Therefore I object to this planning proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We strongly object to this development as a pledge to protect the Green Belt is a pledge which must be honoured.

The residents of Send Hill have built up our community for years by taking an interest. This is about to be demolished if your development is to take place.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster]
good relations between persons with a protected characteristic and persons who do not share it] and you will have to live with the added problems as residents "pull up their drawbridge".

The area will lose its attraction and change character in a very short time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7292   Respondent: 15447777 / Maggie Kalupka   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The traffic through Ripley currently, especially that going towards the A3 London bound, is already, at times extremely heavy, how the roads would cope with the extra local traffic created is hard to imagine.

With large developments at both Gosden Farm and Wisley Airfield adjacent roads would come to a complete standstill. Ripley has over the past two or three years seen many small pockets of housing developed, the proposed plan at The Talbot is over development in the conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7291   Respondent: 15447777 / Maggie Kalupka   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of any local villages from the Green belt. It would seem that the current plan is for a disproportionate amount of development in one small area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7290   Respondent: 15447777 / Maggie Kalupka   Agent: 

965
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3320  Respondent: 15447873 / Karen Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT TO 400 HOUSES and 7000 sq METRES OF INDUSTRIAL SPACE AT GARLICKS ARCH ,opposite Send Marsh RoadThe site floods and is covered by ancient woodland. The industrial space could be comfortably located elsewhere for example Slyfield. There seems no desire to explore and develop brownfield sites. Again this would put more pressure on traffic with an escalation in the number of motor accidents. Having lived in Potters Lane for 20 years I have already witnessed this increase. On one evening there were 4 accidents outside my home at the bottom of Potters lane within the space of an hour. The river Wey is more prone to flooding. Road water runoff now more prevalent. Access onto and ingress from A3 is particularly dangerous. this road should be closed. discussions with the police suggest they are very supportive of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 4.jpg  (53 KB)  2.jpg  (113 KB)  1.jpg  (88 KB)  3.jpg  (34 KB)

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Comment ID: PSLPS16/3322  Respondent: 15447873 / Karen Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO NEW INTERCHANGE WITH A3 AT BURNT COMMON. The 5850 homes including Gosden Hill Burpham, wisely will derive more traffic through Send. Already excessive pollution, noise, flooding would worsen. Potter Lane’s traffic has already increased exponentially over last 20 years.

A few photographic examples. This is all very ill thought out. Councillors and politicians need to be better than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3321   Respondent: 15447873 / Karen Robinson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO THE DEVELOPMENT OF 40 HOUSES AND 2 TRAVELLER’S PITCHES AT SEND HILL. Again very narrow access that can barely take a single car let alone traveller caravans and lorries. This road particularly the steep downhill part into Potters Lane would be lethal from a traffic point of view for cyclists, walkers, motorists and children walking to schools and buses. It would also put pressure on wildlife being in close proximity to the River Wey with commensurate increase in pollution etc. Additionally is the council actually aware of the road width here in places it is not much more than 2 metres wide. It will be impossible for the traveller community to get their caravans and trucks along this lane. This has not been thought out in a detailed way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7294   Respondent: 15447873 / Karen Robinson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO PRESSURE ON GENERAL INFRASTRUCTURE with it now being far more difficult to get appointments at the Send Barns surgery. I had to drive down to book an appointment for my teenage daughter as when phoned at 8 am being unable to get through that would be my only option for an emergency appointment. This has never been case in the recent past. Send’s infrastructure cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7293  Respondent: 15447873 / Karen Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO SEND VILLAGE BEING REMOVED FROM THE GREEN BELT. The Green Belt was intended to be permanent as required by the National Planning Policy Framework. Send’s Green Belt provides an essential buffer between Woking and Guildford providing an essential area preventing the area becoming one sprawling conurbation. Specifically I live at the bottom of Potters Lane directly adjacent to the River Wey. There is a plethora of wildlife on the Wey to include deer, swans, cormorants, migrating geese, fox, badger, numerous fish species, snakes, barn owls, birds of prey, bats, kingfisher to name but a few species. Increased urbanisation and the associated congestion and the effects of an increase in population will bring an increase in pollution, pressure on the river with increased flood risk that will be both aesthetically detrimental to the scenic beauty and have a significant negative impact on both the wildlife and incumbent long established human habitation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1715  Respondent: 15448001 / Ann Dowdeswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new housing numbers. The Strategic Housing Market Assessment mathematical model has not been revealed in the plan. I am therefore confused as to how a population increase in the Borough, which is estimated at 70% higher than the official national estimates is calculated?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3327  Respondent: 15448001 / Ann Dowdeswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Development of over 2000 house village at Ockham (former Wisley Airfield). The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away would be enormous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15448001 / Ann Dowdeswell</th>
<th>Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I object to Station Parade being designated a ‘District Centre’. This is a misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

There is no mention of scope to improve infrastructure which is already overloaded. Local Schools are full. Medical facilities stretched. Drainage is inadequate, roads and car parks are overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/7308 | Respondent: 15448001 / Ann Dowdeswell | Agent: |
I object to the Proposal to remove the Horsleys from the Green Belt. The exceptional circumstances required before taking this action have **not** been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7309  Respondent: 15448001 / Ann Dowdeswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to the Extension of the boundaries of the Settlement area of the Horsleys; no sound reasons have been given for the proposed changes which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1716  Respondent: 15448193 / B. A. Howell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I object to the potential enforcement of a Local Plan for mass house building across our Borough against the wishes of most of its inhabitants. The method used by the Government is inaccurate and crude, interested parties have used the house building policies of National Government to forward their own pecuniary ends. Alternative methodology and analysis seem to have been lost in the haste to bounce through this crude Plan. It is all based on private speculative development, in the present hiatus of post Brexit Britain, levels of net immigration are likely to fall drastically in the next 5 years as well as house sales through uncertainty. So forecasts based on crude figures of population growth via EU immigration, non -
EU immigration, illegal immigration and indigenous birth rates, will probably render a false outcome. The unnecessary destruction of our local and natural environments is there unwarranted in this rush for growth.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7346  **Respondent:** 15448193 / B. A. Howell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development: Policy D3 Garlick's Arch will lose it's ancient woodland, most of which is protected. TFM will lose it's agricultural land and most of it's wildlife habitat, including scientific areas of interest that will be inevitably affected, such as snakes field bordering Cahtley Heath, due to the proximity of the development. Ockham will be swamped by the TFM new town and the ancient Parish - which comprises Hatchford and Downside - destroyed. Cobham will become a traffic hub from the Horsely Road access by traffic trying to escape the A3. Worst effected will be Ripley, most of which is a conservation area; what will be conserved by the new Plan, traffic congestion?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7345  **Respondent:** 15448193 / B. A. Howell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to unnecessary industrial growth alongside new housing: Policies E1,E2,E5. It is hard to understand why new industrial, warehousing and storage are being proposed for an industrial strategic employment site at Garlick's Arch. There exists an acceptable Brown Field site to the south at Burnt Common which could be used for this and more; why was this removed from the Plan at very short notice and with little or no prior consultation? The use of the GB as opposed to the latter BF site will result in the loss of dozens of long established local established jobs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to policies I2, I3: the proposed ThreeFarms Meadow and Garlick's Arch site will need considerable alterations for Trunk road access; who will pay for this? It seems that the question is just assumed away, it will happen to allow the developers to build. If that assumption is based on the ordinary tax payer funding road improvements, then it is high objectionable; why should any one allow tax payers money to subsidise private development profit when they object to the whole Plan in the first place. Either way the situation on the A3 and M25 is one of total congestion at key times; the A£ is congested between Guildford and Cobham, most all the time; how do the authorities think that thousands more vehicles are going to be accomodated?

With air quality breaking the limits set for healthy habitation, the polution levels, Nitrous oxide, Beazines etc, will undoubtedly rise to totally illegal standards. The situation in the north of the Borough is already extreme.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the potential for damage to the environment: Policy P2, represents a complete failure to protect the Green Belt. The alteration of GB and Parish community boundaries is not justified, it is a goal post moving exercise to allow Planning permission to be easier.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the potential for damage to the environment: Policy P4, represents a complete failure to protect the Green Belt. The alteration of GB and Parish community boundaries is not justified, it is a goal post moving exercise to allow Planning permission to be easier.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is a real risk that excessive flooding will derive from Flood plain building, the proposal of 400 houses plus industrial units at Garlick's Arch is a good example, it regularly floods now during winter, this Plan will make that moreso (Policy P4). No account is made for conservation areas, AONB, scientific interest or wildlife habitat in general.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7341  Respondent: 15448193 / B. A. Howell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the Plan specific, I object to policy S1, S2; sustainability and disproportionality. None of the proposed major strategic sites are really feasible as communities, the costs involved developing them will be borne out on neighbouring established communities, such as Ripley, Send, Ockham Hatchford et al. There are no infrastructure improvements planned, it is assumed that thousands of vehicles can be accomodated by the existing roads; they clearly can't as roads are near grid lock at times now; eg Ripley High St. Many of the existing roads are not able to be expanded, even if that were possible, it is not desirable as it only accomodates unbridled growth of extra traffic, excassertbating a current major problem (policy I1). No proper improvements appear to be planned to sewage systems, medical services electrical supplies Bus or rail services Rail is limited and vehicles are always needed to get to a station miles away, Bus services are actually closing; e.g.Rourtes 462, 463.

The density and numbers of the proposed houses are skewed towards the north of the Borough. The 5,000 proposed between Burpham and the M25 will represent the worst example of ribbon development. The north of the Borough could end up one vast urban sprawl, stretching from Cobham to Guildford. No critical plan has been described at any stage of the 'consultation' in regard to the method for actually building these estates. They just seem to be expected to evolve seamlessly over a number of years. That clearly is a nonesense, the surrounding areas will subjected to unbridled industrial activity, making day to day life miserabale; why should residents have to put up with that for years.

I object to policies I2, I3: the proposed ThreeFarms Meadow and Garlick's Arch site will need considerable alterations for Trunk road access; who will pay for this? It seems that the question is just assumed away, it will happen to allow the developers to build. If that assumption is based on the ordinary tax payer funding road improvements, then it is high objectionable; why should any one allow tax payers money to subsidise private development profit when they object to the whole Plan in the first place. Either way the situation on the A3 and M25 is one of total congestion at key times; the A3 is congested between Guildford and Cobham, most all the time; how do the authorities think that thousands more vehicles are going to be accommodated?

With air quality breaking the limits set for healthy habitation, the polution levels, Nitrous oxide, Bezines etc, will undoubtedly rise to totally illegal standards. The situation in the north of the Borough is already extreme.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2642  **Respondent:** 15448289 / Paul Miller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5524  **Respondent:** 15448289 / Paul Miller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5489  **Respondent:** 15448289 / Paul Miller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5423  Respondent: 15448289 / Paul Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5429  Respondent: 15448289 / Paul Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5476  Respondent: 15448289 / Paul Miller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5455  Respondent: 15448289 / Paul Miller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7354  Respondent: 15448289 / Paul Miller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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<td>the general infrastructure in Burpham is inadequate to deal with the increased housing proposed.</td>
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<td>the road system in Burpham is inadequate to deal with the large volume of extra traffic that would be generated, and this will lead to congestion and increases in accidents at junctions and roundabouts</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the 2016 Draft Local Plan. In particular, I would comment as follows:</td>
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<tr>
<td>it is unacceptable that Green Belt land is being used for development</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7351  Respondent: 15448289 / Paul Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan. In particular, I would comment as follows:

there are far too many houses proposed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1112  Respondent: 15448289 / Paul Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I hope that the objections of residents will be taken into account, and diktats from central government will be challenged where they threaten the quality of life in this borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1719  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1724  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3358  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3344  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highections Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/7393  **Respondent:** 15448321 / Nicole Mapplebeck  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7431 Respondent: 15448321 / Nicole Mapplebeck Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7436 Respondent: 15448321 / Nicole Mapplebeck Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7378  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The parking in this area is limited and public transport poor.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7383  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7388  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7446  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7426  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7416  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7421</th>
<th>Respondent: 15448321 / Nicole Mapplebeck</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</strong></td>
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Compliant? ( )** | | |
| **Answer (if comment is on questions 1-7 of the questionnaire): ( )** | | |

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and
explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPP16/7441 | Respondent: 15448321 / Nicole Mapplebeck | Agent: |
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

Roads through West Clandon are extremely busy at rush hour and peak commuter periods. The development will only result in additional traffic through these routes, posing serious threats to life and health of villagers using the pavements and paths in the village. Heavy vehicles frequently mount the curbs and pavements at speed in these areas. Traffic is so heavy Station users in Clandon can wait for more than 10 minutes to pull out in busy periods, causing massive congestion in the village.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road
network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7405  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7411  Respondent: 15448321 / Nicole Mapplebeck  Agent: 15448321

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPP16/7368  Respondent: 15448321 / Nicole Mapplebeck  Agent: 15448321

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7373</th>
<th>Respondent: 15448321 / Nicole Maplebeck</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. The site at Garlicks Arch also comprises much greenfield areas – their loss will contribute to the increased flood risk of other local areas, particularly Send Marsh, which has a history of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7363   Respondent: 15448321 / Nicole Mapplebeck   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing
that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1113   Respondent: 15448321 / Nicole Mapplebeck   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.
The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1123</th>
<th>Respondent: 15448321 / Nicole Mapplebeck</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1128  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4661  Respondent: 15448321 / Nicole Mapplebeck  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4664  Respondent: 15448321 / Nicole Maplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3103  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/617  Respondent: 15448321 / Nicole Mapplebeck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1720  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1726  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
◦ failure to correct for errors in the historical data for international migration flows,
◦ issues with the way it considers students and affordability and
◦ flaws in the method for estimating the number of homes needed to support job growth.

○ It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15448353 / Emily Roberts</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3345  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3352  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement—often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/7437</th>
<th>Respondent:</th>
<th>15448353 / Emily Roberts</th>
<th>Agent:</th>
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</table>
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The parking in this area is limited and public transport poor.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7384  Respondent: 15448353 / Emily Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7389  Respondent: 15448353 / Emily Roberts  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7447  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7427  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7417  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7422  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7442  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium
development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I
believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued
to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected
to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity -
only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy
mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear
market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure
(Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane
junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on
these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for
only one vehicle at a time. In addition, the road surfaces are in a poor condition.

Roads through West Clandon are extremely busy at rush hour and peak commuter periods. The development will only
result in additional traffic through these routes, posing serious threats to life and health of villagers using the pavements and
paths in the village. Heavy vehicles frequently mount the curbs and pavements at speed in these areas. Traffic is so heavy
Station users in Clandon can wait for more than 10 minutes to pull out in busy periods, causing massive congestion in the
village.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a
further deterioration in the road surfaces.
Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

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The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I havegrave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7407  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7412  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7369   Respondent: 15448353 / Emily Roberts   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. The site at Garlicks Arch also comprises much greenfield areas – their loss will contribute to the increased flood risk of other local areas, particularly Send Marsh, which has a history of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7359  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/7364</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1114  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1124  **Respondent:** 15448353 / Emily Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. **“Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.”** Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>15448353 / Emily Roberts</th>
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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1721  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1727  Respondent: 15448385 / Edward Bates  Agent:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7395  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to Policy D3 - Historic environment</td>
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<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
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<td>I OBJECT to Policy D4 - Development in urban areas and inset villages</td>
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<td>The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.</td>
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<td>The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.</td>
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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The parking in this area is limited and public transport poor.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7385  Respondent: 15448385 / Edward Bates  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/7390  **Respondent:** 15448385 / Edward Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/7448  **Respondent:** 15448385 / Edward Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7428  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7418  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

Roads through West Clandon are extremely busy at rush hour and peak commuter periods. The development will only result in additional traffic through these routes, posing serious threats to life and health of villagers using the pavements and paths in the village. Heavy vehicles frequently mount the curbs and pavements at speed in these areas. Traffic is so heavy Station users in Clandon can wait for more than 10 minutes to pull out in busy periods, causing massive congestion in the village.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure
capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7408  Respondent:  15448385 / Edward Bates  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.
There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7413  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7370  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7375  Respondent: 15448385 / Edward Bates  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. The site at Garlicks Arch also comprises much greenfield areas – their loss will contribute to the increased flood risk of other local areas, particularly Send Marsh, which has a history of flooding.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7360  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/7365  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15448385 / Edward Bates</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1130  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4554  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4556  Respondent: 15448385 / Edward Bates  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon.
The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming even more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/2992  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/585  Respondent: 15448385 / Edward Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7357  Respondent: 15448417 / Surrey Sports Park (Karen Rothery)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

No comments or questions are visible for this document.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey Sports Park is an important facility in Guildford which provides not only sport and physical activity provision for students but also is the base for the Harlequins Premier league rugby team. It provides public access for over 80 community clubs for a variety of sporting activities, it attracts members of the community that are interested in well being and attaining higher levels of fitness and is an important venue for major sporting events which deliver significant economic impact to Guildford. We provide high levels of community engagement with disadvantaged people in the area through our schools and community liaison work and our outreach programmes, which are particularly targeted at young people, and delivered through our professional sportsmen and women paying in our three sport franchises: SurreyStorm, Surrey Scorcheres and Surrey Smashers.

I understand that the draft plan for the period 2013 to 2033 is out for public consultation.

From the perspective of the Surrey Sports Park I am writing to support the policies which will:

- Assist in recruitment and retention of staff by providing wider access and choice of housing, particularly where this is within walking distance from our centre
- Provide better access to the West from our location at Manor Park by investing in Infrastructure.

I understand that to provide these benefits there will be a need to redraw the greenbelt boundary to provide for these important policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1723  Respondent: 15448449 / Carol Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3349  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3356  Respondent: 15448449 / Carol Roberts  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15448449 / Carol Roberts</th>
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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7382  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The parking in this area is limited and public transport poor.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7387  Respondent: 15448449 / Carol Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7392  Respondent: 15448449 / Carol Roberts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7450  Respondent: 15448449 / Carol Roberts  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7430  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home” is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7420  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7404  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

Roads through West Clandon are extremely busy at rush hour and peak commuter periods. The development will only result in additional traffic through these routes, posing serious threats to life and health of villagers using the pavements and paths in the village. Heavy vehicles frequently mount the curbs and pavements at speed in these areas. Traffic is so heavy Station users in Clandon can wait for more than 10 minutes to pull out in busy periods, causing massive congestion in the village.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7415  **Respondent:** 15448449 / Carol Roberts  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. The site at Garlicks Arch also comprises much greenfield areas – their loss will contribute to the increased flood risk of other local areas, particularly Send Marsh, which has a history of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7362</th>
<th>Respondent: 15448449 / Carol Roberts</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7367   Respondent: 15448449 / Carol Roberts   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/1117  **Respondent:** 15448449 / Carol Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).
Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1132</th>
<th>Respondent: 15448449 / Carol Roberts</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the removal of Send, Ripley and Clandon from the Green Belt because the villages and their countryside provide a necessary buffer between Woking and Guildford.

• I object to building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

• I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas, much closer to existing transport hubs.

• I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

• I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the A247 would be gridlocked all day.

• I also object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including

• I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing level Roads, doctors' surgeries and schools will be unable to cope.

• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 and our road, Send Marsh Road, which are all already at 100% capacity especially during the rush hours.

• I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the

• The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

• Please show my comments to the Planning Inspector, and please confirm receipt of my letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1733  Respondent: 15448865 / Matthew Risdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the development at Garlick's Arch because the stream which runs through that area ends up across the road from our house, in Send Marsh Road, and it has flooded in the past. The new development would increase the amount of run-off into the stream, by replacing soft, permeable, vegetated surfaces with new hard surfaces, and therefore increase the risk of flooding downstream on Send Marsh Road. The development site also has a particular conservation sensitivity as it includes much old woodland. I believe trees which existed in the 16th century would be endangered. The site itself is also subject to flooding.

• I also object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

• I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

• I object to the removal of Send, Ripley and Clandon from the Green Belt because the villages and their countryside provide a necessary buffer between Woking and Guildford.

• I object to building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

• I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas, much closer to existing transport hubs.

• I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

• I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the A247 would be gridlocked all day.

• I also object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

• I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agriculture land and produce congestion on the A3 and surrounding roads including

• I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing level Roads, doctors' surgeries and schools will be unable to cope.

• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 and our road, Send Marsh Road, which are all already at 100% capacity especially during the rush hours.

• I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the

• The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

• Please show my comments to the Planning Inspector, and please confirm receipt of my letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The SA details that where developers demonstrate that providing the amount of affordable housing required by policy would not be economically viable, the Council will follow the following cascade mechanism to assist with delivering a scheme: 1) vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; 2) reduce the overall number of affordable homes. The door appears to be wide open for the council to move against its stated local plan provisions in order to allow future developers to demonstrate that ‘affordable housing’ is not actually economically viable and that they should be permitted to make more money by building larger houses. What is actually the driving force behind these proposals? Without this knowledge I object most strongly. The SA concludes that there remains some uncertainty regarding delivery of an appropriate housing mix more generally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to building 45 houses at Clockbarn Nurseries because of inadequate access and traffic volumes (please see below).
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I object to building 400 houses and 7000 sq. metres of industrial space at Garlick’s Arch. Please see below for detailed reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3372  Respondent: 15448897 / Ruth Brothwell  Agent:</th>
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I object to the new interchange with the A3 at Burnt Common in its currently proposed form. There is no mention of improvements to local road infrastructure as a dependency on this proposal. Local roads through Send and Ripley are already heavily congested with pipeline plans leading to further volumes. Traffic already queues at peak periods as existing roads can scarcely cope with the current levels of traffic. Please see below for more information relating to my object on this issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the development of 40 houses and 2 traveller pitches at Send Hill. It is an inappropriate location because of the narrow width single access country road providing insufficient access - please see below for further details on traffic issues. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil beautiful and historic countryside including the ‘five manors of Send’ which are a matter of historic record.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy D4 (Development in urban areas and inset villages) requires that: “proposals for new development within inset village areas will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape and views within the village of local landmarks.” As previously mentioned this proposal does not fulfill this requirement particularly in the area of the distinctive settlement pattern of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Guildford’s housing requirements seem confusing as the basis for calculations has not been disclosed. Guildford attracts and maintains a mature and more wealthy citizen. Whilst the aim to provide housing for the younger generation is of course essential and well intentioned there does not seem to be any correlation between the proposed future prosperity of the borough and the looked for increase of workers in the borough doing the jobs we see advertised. I worry that older, wealthier people will move out as a result of the changes proposed and be replaced by low paid individuals who will be less able to contribute to the overall economic sustainability of the borough. There is a lack of information concerning the jobs and work that would be undertaken and mention of employment by local hospitals and care homes is clearly a statement of intention to attract low paid workers requiring very low cost housing.

Policy H1 of the Local Plan (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, appropriate to the site size, characteristics and location, with a view to meeting the accommodation needs established...
by the latest Strategic Housing Market Assessment (SHMA). It says that as well as the benefits it can provide to people’s lives, families and communities, suitably sized, priced and located housing can also help to support the economy by ensuring people with a wide variety of occupations can live in the borough. I refer to comments above concerning the availability of jobs and their wages in order to affirm this aspiration. Is there any assurance that the houses proposed will be low cost? (This is not the usual experience in the borough nor of the intentions of developers as can be seen by very recent small development within Ripley and Send. New cottages built in Newark Lane cost in excess of £half million and new houses at Skeens Lane in Send have been marketed for £690.000 - http://www.rightmove.co.uk/house-prices/Send.html)

A large area of low cost housing suitable for low paid residents does not fulfill the aspiration of supporting the economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7460  Respondent: 15448897 / Ruth Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our Infrastructure - working with partners to deliver the massive improvements needed in the next 20 years, including changes to tackle congestion issues – this proposal does not fulfil this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7469  Respondent: 15448897 / Ruth Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The SA states with regard to GP Surgery access that there ‘is little potential to conclude on the ability of surgeries to accept additional patients or expand.’ The surgery is already heavily subscribed. Pressures on local GPs are mounting as other national considerations take hold. The SA continues by stating that ‘the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery.’ The plan does not contain any firm commitment for sustainable transport from the proposed development areas to GP surgeries, should there be room for the large number of young people expected to take up residence (400 x 3 people per house = 1200 new patients).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The SA states that ‘adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use include recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, localised air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods.’ This is very much the case in the above proposed developments. Traffic queues at peak times through Ripley and Send villages and the increased expectation of traffic from the proposed developments is not sustainable.

An objective of the SA was to ‘achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)’. There are no plans mentioned for providing the means of sustainable forms of transport from the above mentioned developments. Guildford residents use cars and these proposals only increase the likelihood of more cars on our roads.

Furthermore the Department for Transport’s Road Investment Strategy includes schemes for the A3 in Guildford and the M25 Junction 10/A3 Wisley interchange; Also, it says that interim ‘quick win’ schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period. But ‘some’ relief does not commit to assuring residents that any work will be undertaken in this area.

The SA states that the delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3. When will we know about this and is the Guildford plan being held back until such information is confirmed? No statement is included to this effect.

The SA notes that another important consideration is the potential for increased traffic to impact on historic character within Conservation Areas; It states that it is difficult to draw strong conclusions in the absence of detailed modelling work. Should this not be a pre-cursor to any plan? An issue of particular importance it notes is that there is likely to be an increase in traffic through the Ripley Green and Ockham Conservation Areas (the former being associated with a high concentration of listed buildings)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the proposals for the above developments.

I object to Send and Ripley villages being removed from the Green Belt with regard to the proposals identified by the Local Plan. Please see below for detailed reasons.

Local Councillors and central government gave a clear election promise to protect the green belt. This reneges on it. I particularly voted in accordance with my wish to preserve the green belt and to ensure that Guildford council had good representation in it. I feel let down by my local government when I read these proposals. I choose to live in this area (I was not born or brought up here) as I have valued the semi-rural nature and convenience of the landscape but should these proposals go forward I will move out.

Loss of the Green Belt

My most important objection is the removal of the villages of Send and Ripley (and other surrounding villages) from the Green Belt. This was a particular electoral objective of mine. I am not alone as I know that other nearby boroughs have expressed concern at some of Guildford’s plans.

The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send and Ripley’s green belt provide an essential buffer stopping Woking and Guildford becoming one sprawling area.

The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. It feels that my local borough considers Green Belt issues to be at the bottom of their priorities despite the feelings of their electorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The local plan seeks alignment with the council’s corporate plan 2015-20 which establishes the ambition for Guildford to be ‘a town and rural borough that is the most desirable place to live, work and visit in South East England.’ It goes on to say that ‘we want Guildford to be a centre for education, healthcare innovative and cutting edge businesses, high quality retail and wellbeing...’ **This plan does not seek to fulfill the above intentions** as it aims to provide low cost housing and industrial units (supporting a town which has rejected high quality retail development in favour of low status anchor tenancy for shopping centres in the future – to the dismay of many residents and council tax payers).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/3668  **Respondent:** 15448897 / Ruth Brothwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the policy A42 because I wish our village to remain in the Green belt and this plan alters that situation.

The increase in homes from 45 to 60 seems like far too much for the area and it ignores all the previous objections which have been made by local people in the village.

The traffic at the Tannery Lane junction and the main road (A247) is already bad as this is a difficult junction to exit - the proposals can only make matters far worse.

This area is subject to flooding - there is a flood plain nearby- The proposal does not contain good plans for removal of surface water.

This village benefits from the Wey Navigation Canal and its open countryside is an asset. So many houses will mar the views which attract tourism on the canal to the area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3669  Respondent: 15448897 / Ruth Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the policy A43 very strongly.

I wish our village to remain in the Green Belt and I cannot see any 'exceptional circumstances' which might enable the council to consider removing us. Living here and purchasing a home here was because of the Green Belt protection to our wonderful countryside. Ripley and Send/Burnt Common are distinct village areas. This proposal tries to link them up resulting in a semi-urban sprawl which goes against the policy of the Green Belt.

Local villagers have already made strong objections which appear to have been ignored! There is no proven demand for Travellers plots in this location.

The number of houses proposed for our village needs is excessive and will cause huge over development of our area. The road networks are already extremely busy and this proposal will result in a huge increase of traffic. Local roads and junctions with the main A3 simply will not cope with the extra influx. Additional traffic jams will result causing untold delays and inconvenience to people trying to commute to London or deliver children to local schools.

The area is subject to flooding (it is currently a flood zone 2 area) - further development will only make matters worse.

The area in question has been used over many years for shooting and the land is contaminated by lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3670  Respondent: 15448897 / Ruth Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A58 at Burnt Common - this was deleted from an earlier draft (in 2014) because of all the objections made. Why is it suddenly back on the agenda?

There has been a decline in the demand for industrial land since the first proposal - yet I note that what was proposed as a maximum number in the original plan is now a minimum number!! Reduction in need was demonstrates in the 2017 Employment Land Need Assessment - we do not need this huge over allocation of land in our Green Belt.

There are empty sites and industrial units at both Slyfield and Guildford which surely need filling before any further industrial expansion is proposed? I strongly wish our villages to remain in the Green Belt and do not believe there is a need to ruin the area by increasing the industrial property available.

As stated above this proposal aims to link up two distinct village areas which is against the purpose of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1861  **Respondent:** 15448897 / Ruth Brothwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because this will adversely affect the nature of the surrounding countryside situated so close to the Wey Navigation. Expansion and development of this area goes against Green Belt intentions regarding the openness of the countryside. It is inappropriate.

Access along Tannery Lane is very difficult in both directions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPS16/3379  **Respondent:** 15449025 / Roger F Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to register my objection to the above proposals which will have an unacceptable impact on this community.

I hasten to add that I fully accept the need for additional local housing, but this should be of modest scale, defiantly not the concentration and number of houses in this proposal, that would double the size of the village and completely change the character of the village.

It is my understanding that the justification for the proposal to build on Green Belt land is linked to the building of a new secondly school. My understanding is that, quite apart from other practical objections there is no existing or anticipated need for addition school places in the Borough. In fact there are at least two undersubscribed local secondary schools that have expressed a willingness to expand should a future need arise.

Other practical objections are.

The proposed land is in the low point of the valley and is subject to flooding.

Both Glaziers and Westwood Lanes are already over used minor roads with dangerous bridges which are in effect rat runs off the A31, this would only become even more acute if this proposal was adopted.

School Lane is already a dangerous spot and the additional traffic and pressure on Wyke Primary school has not been considered.

The Guildford Road already is over load and this would only become more acute.

I don’t believe that the local services will cope with the magnitude of the proposed expansion. My home is already subject to interruptions in the electrical supply.

There is no planned provision for additional medical facilities, shops, pubs and facilities for young people.

I sincerely trust that this plan will not be taken forward which is clearly against the wishes and best interests of the existing local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Draft Local Plan in respect of Normandy and Flexford.

I am writing to register my objection to the above proposals which will have an unacceptable impact on this community.

I hasten to add that I fully accept the need for additional local housing, but this should be of modest scale, defiantly not the concentration and number of houses in this proposal, that would double the size of the village and completely change the character of the village.
It is my understanding that the justification for the proposal to build on Green Belt land is linked to the building of a new secondly school. My understanding is that, quite apart from other practical objections there is no existing or anticipated need for addition school places in the Borough. In fact there are at least two undersubscribed localsecondary schools that have expressed a willingness to expand should a future need arise.

Other practical objections are:

The proposed land is in the low point of the valley and is subject to flooding.

Both Glaziers and Westwood Lanes are already over used minor roads with dangerous bridges which are in effect rat runs off the A31, this would only become even more acute if this proposal was adopted.

School Lane is already a dangerous spot and the additional traffic and pressure on Wyke Primary school has not been considered.

The Guildford Road already is over load and this would only become more acute.

I don't believe that the local services will cope with the magnitude of the proposed expansion. My home is already subject to interruptions in the electrical supply.

There is no planned provision for additional medical facilities, shops, pubs and facilities for young people.

I sincerely trust that this plan will not be taken forward which is clearly against the wishes and best interests of the existing local community.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3380  **Respondent:** 15449057 / John Gribble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I would like to object to the Guildford Borough Plan on the following points:

- I am against the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- I am against the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000+ dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.

• I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.

• The increased traffic if the proposal is implemented will cause serious congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development and will not be able cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

• There is no suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used but the car park there is already full. The use of Cobham or stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

• I object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

• I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

• Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

The existing local services such as foul and surface water drainage cannot cope with such a major addition without resulting in increased flood risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sir/Madam

As a local resident I would like to strongly object to the proposed destruction of our Green Belt countryside at Normandy in Surrey to build 1100 homes and a school. (please see the attached pictures of the proposed site). The planning proposal is not only totally disproportional to the surrounding countryside and village but it’s also proposed on Green Belt agricultural, grazing land and not safeguarded land as you claim.

The local schools, in Guildford, are only 43% full so have a surplus of 57% so this school will be a folly to get the planning granted!

Guildford Borough Council claim they respect the British countryside (see the link below) yet they are planning to build an 1100 unit housing estate and school on Green belt fields.

http://www.surreyhills.org/discover/ (Please see the map)

The village roads are not suited to the vast amount of traffic that 1100 homes will produce, averaging of 2000 extra cars on roads that are not fit for purpose some of which have a single lane pass through (under a railway bridge), low level lighting and no pavements. This would cost the council a considerable amount to make safe for the increase in residents, not to mention the fact that the land and village are prone to flooding.

Don’t turn our beautiful village surrounded by countryside into a town. There are other proposed sites closer to Guildford at Blackwell farm which would make a far more suitable site for a new school.

I grew up in Feltham, Middlesex and have worked hard all my life to pay my mortgage so that I could move from a built up area to the country, please don’t punish those who have never taken anything from the system, by building what they moved away from in their back yards!

Sustainable agricultural land is being sacrificed for a concrete mess which will have a devastating impact on wildlife with many species of wild bird & mammals (dragonflies, smooth snakes, woodlarks & nightjars etc) having their habitat torn apart forever including the destruction numerous beautiful indigenous oak trees which are hundreds of years old and could never be replaced.

I ask you the simple question “would you want this development in your street”?

We have all been blessed with nature on our doorsteps, as you know, so we need to embrace it & protect it as if these open fields get ripped away it will never, ever be replaced.

I beg you to save our countryside for ourselves and our children’s children instead of building this terrible legacy which no one could be remotely proud of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [20160626_111137_resized.jpg (1.7 MB)](20160626_111137_resized.jpg)
[picture.jpg (1.7 MB)](picture.jpg)

Comment ID: PSLPA16/1737  Respondent: 15449313 / Michelle Georgiou  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth
Dear Sirs

I would like to raise an objection to the removal of Chilworth from Greenbelt status so enabling future development of housing in the village to go ahead unrestricted.

I strongly object to this on the following grounds;

Chilworth already suffers from severe traffic flow especially at peak travel times (early morning/early evening) so any additional housing built on green field sites in Chilworth would make this situation far worse.

The main road running through the village is often extremely congested as it is the main route to connect to the A25 from all of the local villages in the area (e.g. Shalford, Bramley, Chilworth & Wonersh).

There is inadequate road infrastructure to accommodate further housing as it stands.

There is also a distinct lack of parking on New Road & this is already exacerbated when the Tillingbourne School is in term time & parents are collecting & dropping off their children for school.

There is already heavy demand on the local schools for child places which would only get worse if additional houses were built in the village. Local children are not automatically accepted at the two Chilworth schools due to over-demand on places.

The proposed sites earmarked for losing Greenbelt status would mean that fields would be lost to the village & this would have a detrimental effect on the feel of the village & the wildlife these areas support as well as removing playing fields which the local community can currently use.

Additional housing will also place an extra stress on the already overstretched local doctors’ surgery at Wonersh which currently supports the residents of Chilworth as well as other local villages such as Wonersh, Shalford & Bramley.

In the past several years there have already been extra houses built in Chilworth where the local garage on New Road was removed & built upon & a residential care home was closed in favour of a modern flat complex being developed.

All of this proposed development would have a negative feel on the village & would remove part of the rural character of the village. Chilworth is a historic village & part of the Surrey Hills & should be preserved as such for future generations to enjoy.

In summary, I object to Chilworth being removed from Greenbelt status & wish to file my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), Hatch Lane Ockham, GU23 6NU now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwelling

I write to strongly object to the inclusion of TFM in the current draft Local Plan for the following reasons:

1. I object because the impact on the local greenbelt area will be unacceptable and it seems that the applicants have shown a total disregard for those residents that have been living here for many years. It beggars belief that the TFM developer’s plans include the closure of several of our local roads forcing us to take detours of several miles to get to our destinations.

2. I object because it is a fact that there is currently severe congestion on the major roads in the area yet this plan would bring an addition of well over 4,000 extra cars for the houses alone plus all the extra cars bringing the school students to the proposed school.

3. I object because the suggestion that people in the area should stop using their cars in favour of walking or cycling is ludicrous. There are no footpaths on these unlit country lanes, no cycle tracks and with the speed at which traffic leaves the adjacent A3 and races down Old Lane no-one in their right mind would risk their life on either mode of travel. Road public transport doesn’t exist in the area.

4. I object because the roads are not coping with the current through traffic and neither are the road surfaces with many potholes and dangerously deep gullies alongside the carriageways and they regularly flooded. I wrote to the council about two roads (Plough Lane and Horsley Road) that are frequently flooded but was told there is no funding in the budget to resolve the situation. Incidentally the flooding was not as a result of the river breaking its banks as the council claimed but by the excess water coming off the surrounding fields which should be controlled by ditches.

5. I object because of the increased number of commuters this will bring to an area where rail public transport is already completely overstretched. How would the two local stations cope with the increased commuter traffic let alone the local country lanes? The distance from the TFM development would necessitate the use of a car. The Railway stations of Effingham and East Horsley are well over a mile from this site and neither of them have spare parking capacity.

6. I object because of the effect resulting from the increased sewerage output that will be caused. How will the water supply cope with the demand? Thames Water have concerns with the limited capacity.

7. I object because of the claim that housing shortage is a reason for the TFM development but there are plenty of alternative sites to resolve this situation. This site was not listed for development under the 2003 Local Plan probably because there is not enough land to provide a sustainable community based on GBC’s own parameters. There are still no “very special or exceptional circumstances” to have added this site to the Local Plan.

8. I object because the TFM developers have decided to include a secondary school in their plans having woken up to the fact that the existing schools would not be able to cope with the additional school age inhabitants. The nearest school, the Howard of Effingham is already extremely over-subscribed. I therefore object because if it is eventually built this new school would attract pupils from the surrounding area thus increasing the traffic congestion in the area even further.

9. I object because of the fact that when the airfield was requisitioned in wartime when an undertaking was made to return it to agricultural use, removing the buildings (which was done) and removing the runway which should have been done because this is a green belt area. TFM developer’s description of the site as brownfield is a gross over-simplification. 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remaining runway, perversely a habitat for rare flora and fauna, (14ha) has never had any buildings on it. The remainder of the site (55%) is high quality agricultural land.

10. I object because the detrimental impact on the wildlife in this area of the green belt seems to have been totally dismissed as irrelevant. Creating a triangle with two seriously main roads and this band of densely packed houses leaves little room for the wildlife with perils on all sides.
11. I object to the fact that for those of us living in Ockham and the surrounding area would suffer the extreme detriment to the air quality and the visual and aural amenities of the area plus have to put up with the resulting destruction to the environment. The homeowners around Ockham and Horsley will have their life completely blighted by this new town as will the wild life.

12. Finally I strongly support the principle that the countryside should be protected from landowners whose only wish is to line their pockets which seems to me the main reason behind including this development in the draft Local Plan.

I thank you for taking the time to read my objections and for taking them into consideration when finalising the new Local Plan. I truly hope you will agree that the former Wisley Airfield site aka Three Farms Meadows (TFM) should very definitely be removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Concern over infrastructure, already known existing deficit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7492</th>
<th>Respondent: 15449377 / James Busby</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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Loss of green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Disproportionate level of development in one area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15449409 / Margaret Ashmore</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</th>
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I Object to any houses etc being built in and around Send, Send Marsh, Ripley, Ockham, and Burpham.

for each house built - think at least two cars, so a TOTAL of 6325 would equate to 12600 vehicles on our country roads, which are not made for such an increase in traffic, they are at Full capacity now.

I Object to the proposed new interchange with the A3 at Burnt Common, if there is an accident on the A3 where does the traffic go, through the villages. We already experience problems if the A3 or M25 are closed due to Accidents - where does the traffic go - through the villages.

When Newark Lane was closed for 6 months for bridge work, all traffic was diverted through Send or Ripley to get anywhere - this caused long delays.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7496  Respondent: 15449409 / Margaret Ashmore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Council stick to your policies with regard to what you are protecting.

I REPEAT GREEN BELT MUST STAY and not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2400  Respondent: 15449409 / Margaret Ashmore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this plan in total. All the villages within this plan would not benefit at all in fact on the contary, it would be a disaster. They are all steeped in history and MUST REMAIN in the Green Belt which you have said time and time again you would uphold, there appears to be no consideration for the wild life in these areas or in this plan. I personally have enjoyed having the deer visit our roads and fields, if we lose this they and many other wild animals and birds, through your TRESPASS into their habitat (Green Belt) will never return.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7502  Respondent: 15449473 / Liz Markwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is also essential that such developers not be permitted to avoid contributing to the infrastructure levy and to affordable housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7504  Respondent: 15449473 / Liz Markwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure. We already face a significant deficit in all aspects of infrastructure. Roads are congested, GP's surgeries and schools are at more than capacity. I do not believe that Guildford town centre, in particular, can handle increased pressure in any of these areas. So infrastructure planning must precede development.

The too small gyratory with its surfeit of traffic lights needs to be done away with. I totally support the idea of an additional road crossing over the river and railway in the area of the courts, and I believe the land which would be required for this should be safeguarded in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
First I would like to say that I love Guildford. It has many good things going for it - from its historic High Street to the huge economic contribution made in recent years by the University of Surrey.

I don't believe that towns can survive by avoiding change and simply doing nothing. That is the pathway to serious deterioration of the quality of life of the town. I am in favour of managed growth. I do also understand that there is a need for a significant number of new dwellings, in part to make up for under-investment over the last few years.

The number of new houses in the Local Plan is high and I believe that, only by putting serious effort into building on brownfield sites in the town centre, in combination with a limited number of large developments further out, can anything like this number be achieved. Such large developments should emulate the Canadian-style sub-division model where schools, shops and surgeries etc. are built at the same time, thus creating a proper community.

In my view, there are some major constraints which need to be tackled before any real development can occur:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I live outside the borough but I have a greater interest in what goes into the Guildford Local Plan for the local area than those living on the far side of the borough for the following reasons:

- The removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- The threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- The potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- The issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- Little consideration is being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7510</th>
<th>Respondent: 15449665 / Robin &amp; Victoria Doelly</th>
<th>Agent:</th>
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Infrastructure will be further stretched to cope and Station Parade should not be classified as a district centre. I believe this would have a real negative impact locally and for the enjoyment of the many who come and visit this area leading into the surrey hills on a regular basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We live happily close to Effingham Junction...

I would like to raise our concerns and objection to the large scale development plans proposed around Horsley.

This should remain a green belt area and I have not heard sound reasons to change this or remove under 'exceptional circumstances' the protection that his area has for the enjoyment of all and preservation of our country and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/3412</th>
<th>Respondent: 15449697 / Kevin Hewton</th>
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</table>
I would like to register my objection to the above planning application in and around Send / Ripley

My objection is based on

1. Over density of New Houses
2. The local schools do not have the capacity to take in all the expected children
3. Send Surgery is already oversubscribed making it difficult to get an appointment, additional residents would exasperate this
4. The traffic through Send and Ripley already causes gridlock at certain times of the day additional vehicles would again exasperate this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1742  Respondent: 15449857 / Fiona Cumberland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/1742  Respondent: 15449857 / Fiona Cumberland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3417  Respondent: 15449857 / Fiona Cumberland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3418  Respondent: 15449857 / Fiona Cumberland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3416  Respondent: 15449857 / Fiona Cumberland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7516  Respondent: 15449857 / Fiona Cumberland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7513  Respondent: 15449857 / Fiona Cumberland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7517  Respondent: 15449857 / Fiona Cumberland  Agent:
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<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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</table>
The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7511  Respondent: 15449857 / Fiona Cumberland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7515  Respondent: 15449857 / Fiona Cumberland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1744  Respondent: 15449889 / Harriet Bell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
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<th>Comment ID: PSLPA16/1745</th>
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There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Comment ID: PSLPP16/7521  Respondent: 15449889 / Harriet Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Answer (if comment is on questions 1-7 of the questionnaire): ()

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7527  Respondent: 15449889 / Harriet Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7528  Respondent: 15449889 / Harriet Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>PSLPP16/7522</td>
<td>15449889 / Harriet Bell</td>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/7519 | Respondent: 15449889 / Harriet Bell | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/7523 | Respondent: 15449889 / Harriet Bell | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. The junction with Send road is already dangerous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina both of which will generate additional heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 7000 sqm of Industrial space at Garlicks Arch opposite Send marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Slyfield also has many vacant industrial units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to a new interchange with A3 at Burnt Common as Send would have to take traffic from the proposed 2000 new houses at Wisley airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Send Road which is already overloaded would become gridlocked with noise and pollution levels that is already excessive.</td>
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<td>I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill. It is an inappropriate location as a narrow width single access country road. Any development there would spoil a high amenity area set in beautiful countryside. For more detailed lines of rejection please contact Send Hill resident [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998].</td>
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<td>I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent and there are no special circumstances abandoning it. Local councillors and central government gave a clear election promise to protect the green belt and this reneges on this.</td>
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<td>I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
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<td>I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. This is of particular concern as I have young children and walking to school is already a difficult task as cars are so fast along the road into the village. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. As mentioned above the traffic is a particular concern to me.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7530  **Respondent:** 15449953 / Clare Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3437  **Respondent:** 15449985 / Elizabeth Mead  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please ensure that my letter is shown to the government inspector.

I object the following:

Policy (A43)

The A247 cannot be widened to take more traffic.

Air quality and noise level for house holders along the A247 must also be considered

Our local Send Surgery (which is my local surgery also) cannot accommodate more patients.

Our local schools are also filled to capacity.
In 2014 the council rejected a planning application from Oldlands to build 25 houses on very sound planning grounds, so now, how is an application to build 400 houses and 7,000sq metres of industrial buildings even being considered?

Residents in Send, Ripley and West Clandon purchased their properties in villages because all are surrounded by Green Belt.

As ratepayers of Guildford Borough Council, they cannot have this Green Belt destroyed and should be more protected in line with the current government policy by their Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3438  Respondent: 15449985 / Elizabeth Mead  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 43a

The New North and South slip-roads to and from AJ to the A247 Clandon Road would generate considerably more traffic, pollution and noise through the A247 Clandon road, Send Village leading to Old Waking, along both roads which are already at capacity without any widening possibility.

We all understand the need to build new houses within the borough, but all brownfield sites should first be used.

I would also favour limited development on the old Wisley airfield providing connecting Country lanes are protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7531  Respondent: 15449985 / Elizabeth Mead  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My family have lived in Woodlands Close, Clandon Road for 32 years. Over this time it is very clear that traffic has increased significantly to such an extent that during peak periods residents of Woodlands joining the A 247. Residents and those living nearby can regularly take up to 10 minutes due to a solid line of traffic coming from Woking to join the A3 in a southerly direction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3433  Respondent: 15450049 / Michael Bedford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I live in Stoke D’Abernon which is in Elmbridge, I have known the area of Ockham and Wisley all my life and view with great apprehension the plans for putting some 2,000 homes on Wisley Airfield. There are ample brownfield sites in urban areas which are more suitable for development and which would be more sensible as these would be near to railway stations and bus routes. Wisley and Ockham are small villages and those who need to travel to London would have to use East Horsley, Effingham Junction or Cobham stations which would lead to considerable parking problems. These railway car parks are already overcrowded with parking in neighbouring roads which leads to traffic congestion. The development at Wisley would make matters much worse.

The nearest shopping centre with supermarkets, banks, restaurants etc. is Cobham. This is already a very busy town with severe parking problems and heavy traffic passing through all the time linking places like Walton and Weybridge on one side to Epsom, Leatherhead and Dorking on the other. More congestion and pollution problems.

If you have a new community with 2,000 homes, there are bound to be households with 4,000 cars. The husband needs one to get to his place of work or to drive to the most convenient railway station; the wife needs one for shopping and taking the children to school (if they can find places that is), with the result that 4,000 cars a day will want to join the A3 near to the junction with the M25. Imagine the accidents that will occur as drivers get impatient with all the overcrowding. On the other side, there are only traditional country lanes which could not possibly cope with an excess of traffic.

Air pollution will get worse especially in the morning and evening with people leaving for work and returning at the end of the day. Pollution there already exceeds permitted levels and the development of Wisley Airfield will make matters worse. I do hope that this scheme is finally rejected and that the airfield is returned for agricultural purposes which was its original function, and as we may have to produce more home grown food in the years ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3434  Respondent: 15450049 / Michael Bedford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the A46 proposal for 1100 homes, secondary school, retail units, shops and showman pitches etc.

I cannot believe the sheer scale of such a development, which will destroy the community and rural environment. Normandy and Flexford are within Green Belt Land and the development is a threat to the Thames Basin Heath Special Protection Area.

A school for 1500 pupils is not needed in our area, as there are over 700 places available to the west of the Borough. There are nearly 500 places available at the new Technical College and I believe there are approved expansions at Guildford County and St Peters. The traffic chaos that will be caused by such a huge development, particularly around school commuting times is just unbearable. Glaziers Lane and Westwood Lane will become gridlocked and many of us will be trapped, not able to get to important appointments without having to factor in an enormous amount of additional travelling time. The Guildford Road already gets backed up into Normandy up to the traffic lights at Aldershot Road, and also Wanborough Hill has long tailbacks in the morning commute. Add the additional amount of traffic caused by school pick ups and drop offs and it will be a total disaster. I dread to think about the amount of cars parked all over the village, to add to the frustration for the Normandy and Flexford residents, and I haven’t even touched on the subject of noise and environmental pollution.

It is truly shocking that a development of this size is being considered within the Greenbelt, and the important views of the village from the Hogs Bank AONB will be destroyed. The characteristics of the Green Belt are their openness and their permanence, which are being totally ignored. There are plenty of brownfield sites which should be used, before devastating the Green Belt areas of The Surrey Hills and The Hogs Back. I believe there are only 2,700 homes planned in Guildford Town Centre, not that many more than what is being proposed for our small villages of Normandy and Flexford.

100% increase in the number of dwellings in Normandy will destroy our rural environment. I only moved out of Guildford to Normandy 3 years ago, to live a more sedate and quiet life. At no stage when my search was going through, was there mention of a development on this scale. It has come to light that at least 2 years ago Taylor Wimpey submitted their plan. No decent efforts seem to have been made to consult with the local people until now.

I will be truly saddened and will probably have to sell my home, if the madness of this proposal is approved. It’s not needed. None of the villagers want this scale of development. None of us want or need the school, indeed it is proved that this is not necessary. None of us want the traffic and parking chaos that will ensue. None of us want to be blocked in our homes and none of us want our beautiful and peaceful village, turned into a town.

Please, reconsider this proposal and keep our beautiful village just the way it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1747  Respondent: 15450081 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3435  Respondent: 15450081 / James Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. A35

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
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6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3440  Respondent: 15450113 / Louise Lawton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send Hill New Housing: 40 x houses and 2 x traveller pitches on Send Hill, which is known as highly desirable prime semi-rural and much sought after location, is the most unbelievable part of the plan. It is a dangerous road at the best of times with our road at the end where you propose building housing narrowing to a single track with a lethal blind corner. Also it would increase traffic to an unacceptable level. I strongly object.

Where to build If you need to build new properties, place them next 10 the A3 (not on the green belt). People should be grateful for a roof over their head albeit not in a prime location like Send Hill that I spent many many years working hard to afford.

Lastly, the properties you are proposing would have an immediate impact on our house values, so compensation would be sought should the plan go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7538  Respondent: 15450113 / Louise Lawton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt: I was absolutely appalled to read that you would contemplate taking the (2-villages of Send & Ripley out of the green bell. We voted for a Conservative Council to protect our rights, not blatantly ride roughshod over them The very mention of losing the greenbelt status in our little village is a betrayal of what we thought you stood for and I strongly object 10 this.

Apart from destroying the very reason I moved into Send 22 years ago to be in a quiet village environment, there is currently greenbelt land at the end of Send Hill that was divided into hundreds of plots and sold off to individuals on the premise that one day, it may lose its green belt status. If the green belt were to be removed the flood gates would be opened to wipe out our village life and destroy our community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3461  Respondent: 15450785 / Georgina Love  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt: I was absolutely appalled to read that you would contemplate taking the (2-villages of Send & Ripley out of the green bell. We voted for a Conservative Council to protect our rights, not blatantly ride roughshod over them The very mention of losing the greenbelt status in our little village is a betrayal of what we thought you stood for and I strongly object 10 this.

Apart from destroying the very reason I moved into Send 22 years ago to be in a quiet village environment, there is currently greenbelt land at the end of Send Hill that was divided into hundreds of plots and sold off to individuals on the premise that one day, it may lose its green belt status. If the green belt were to be removed the flood gates would be opened to wipe out our village life and destroy our community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3463  Respondent: 15450785 / Georgina Love  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
There is no need for new industrial sites at Garlick’s Arch. There is an existing brownfield industrial site at Burnt Common that has the capacity to fulfill the need . That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3462  Respondent: 15450785 / Georgina Love  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition will draw in a huge amount of ‘through’ traffic. The village roads will become more of a cut through than they
already are.

This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7610  Respondent: 15450785 / Georgina Love  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road
infrastructure (Policy I1)

The plan will cause greater congestion in Ripley, Send and Clandon. There appears not to be any plan to improve the
infrastructure. The village roads are in poor condition and narrow and will be unable to sustain the volume of additional
traffic. It will be unnecessarily dangerous and as a mother of two young children is a cause for serious concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7614  Respondent: 15450785 / Georgina Love  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the scale of development, especially at
Garlick’s Arch which has no infrastructure projects in the Infrastructure Schedule to support it and its development. Local
services, utilities and sewerage, doctors etc. are already overstretched and this adds an additional and unnecessary burden.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7615</th>
<th>Respondent: 15450785 / Georgina Love</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
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<td>The A3 or M25 would have to be improved before any development could be completed. Highways England do not have an plans to look and consider improvements to the A3 until 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) are not viable</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to poor air quality concerns (Policy I3)</td>
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<td>The size of the development being proposed, particularly in the north east of the borough, will lead to increased congestion and to greater levels of air pollution. This will have a detriental impact on local residents health and I have particular concerns for the elderly and children in the area.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt. I have actively chosen to buy a house in a village setting within the Green belt and do not wish to see this consumed by the urban growth of Guildford. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7607  Respondent: 15450785 / Georgina Love  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)
The volume of houses proposed is not sustainable and will overdevelop the local villages of Ripley, Send and Clandon. The additional housing is not needed by the local area and the infrastructure is not there with no railway infrastructure for Wisley and Garlick's arch. The roads are already impacted by heavy traffic and will not be able to sustain the additional cars required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7608  Respondent: 15450785 / Georgina Love  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)
The councils proposal to include such a large increase in housing differs from all the other Borough Councils in Surrey and is unbalanced across the borough with too much proposed to the NE of the borough (Wisley/Ripley/Send and Clandon). This seems out of proportion and peculiar particularly as this is Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8240  Respondent: 15450817 / Audrey Gachen  Agent:
I object particularly to the proposed development at Garlick’s Arch and Gosden Hill Farm. The developments are out of proportion to the surrounding area and do not qualify for exceptional circumstances required to take them out of the Green Belt. In addition, I object to the planning policies as follows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY D2 - Sustainable design, construction and energy

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7644  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7645  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/7630</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/7632</th>
<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E2 - Location for new employment floorspace

- It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
- I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7633  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace

• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7634  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E4 - Surrey Research Park

• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7635  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7636   Respondent: 15450817 / Audrey Gachen   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7637   Respondent: 15450817 / Audrey Gachen   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E7 Guildford Town Centre

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7639  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E8 - District centres

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7640  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E9 - Local centres

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7619  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7620  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7622  Respondent: 15450817 / Audrey Gachen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY H3 – Rural Exception Homes
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7646  Respondent: 15450817 / Audrey Gachen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY I4 Green and blue infrastructure
• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7623   Respondent: 15450817 / Audrey Gachen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

• This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7625   Respondent: 15450817 / Audrey Gachen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P2 – Green Belt

• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7626  Respondent: 15450817 / Audrey Gachen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P3 – Countryside (i.e. beyond the Green Belt)

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7628  Respondent: 15450817 / Audrey Gachen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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<td>I object to POLICY P4 – Flood risk and water source protection zones</td>
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<td>• Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.</td>
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<td>I object to POLICY P5 - Thames Basin Heath Special Protection Areas</td>
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<td>• Compensation mechanism too feeble to provide protection.</td>
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<td>• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).</td>
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<th>15450817 / Audrey Gachen</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
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I object to POLICY S1 – Presumption in favour of sustainable development

- No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No statement of how economic, social and environmental impacts should be balanced.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7618  Respondent: 15450817 / Audrey Gachen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7649  Respondent: 15450881 / Ann Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I understand that you are planning to remove Chilworth, Shalford and Peasmarsh, as well as number of other villages in your borough from the Green Belt.

I am writing to you to protest against this proposal in the strongest possible terms.

The Green Belt planning policy was introduced for a reason, a very good one. It is not acceptable to simply remove that restriction because it prevents large corporations from making money. I appreciate that construction companies can’t make large profits from regenerating old areas and renovating old buildings, but planning laws do not exist to allow companies to make money. They exist to protect the people and the land from exploitation. You are proposing to exploit this land and it’s people, which is both unethical and immoral. Deregulation has currently brought our country to it’s knees - deregulating these areas of Green Belt can only add to the chaos.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7662  
Respondent:  15450945 / Sarah Kennedy Scott  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Horsleys’ schools, roads, car parks, drainage, medical practice and local facilities are already fully stretched by existing demands. It is more than likely that additional pressure resulting from 590+ new houses could not be absorbed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7661  
Respondent:  15450945 / Sarah Kennedy Scott  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I acknowledge that the Borough needs identify further sites on which affordable housing can be built, I believe that the proposal to build some 400+ homes in West Horsley is ill-conceived and totally disproportionate to the existing housing stock of some 1,100 homes.

West Horsley does need some affordable housing, but this can be achievable both sensitively, and without comprising the Green Belt status and the protection that it offers. Implementation of the Local Plan proposal for West Horsley will remove that protection and will irreversibly alter the character and nature of the village.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3478  **Respondent:** 15451009 / Michael Love  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government states clearly that housing need is not an exceptional circumstance.

Guildford Borough Council have removed a brownfield site at Burnt Common and, confusingly, replaced it with a site at Garlick’s Arch. This proposed site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to flooding
- It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, doctors or other local amenities

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3481  **Respondent:** 15451009 / Michael Love  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch. There is an existing brownfield industrial site at Burnt Common that has the capacity to fulfil the need. That site was removed from the Plan without any reasoning.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition will draw in a huge amount of ‘through’ traffic. The village roads will become more of a cut through than they already are. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy ID1)
The plan will cause greater congestion in Ripley, Send and Clandon. There appears not to be any plan to improve the infrastructure. The village roads are in poor condition and narrow and will be unable to sustain the volume of additional traffic. It will be unnecessarily dangerous and, as a father of two young children, this is a cause for serious concern.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/7681</th>
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**I object to the lack of proper infrastructure planning for sites (Policy I1)**
The Plan does not identify adequate infrastructure improvements to support the scale of development, especially at Garlick’s Arch which has no infrastructure projects in the Infrastructure Schedule to support it and its development. Local services, utilities and sewerage, doctors etc. are already overstretched and this adds an additional and unnecessary burden. There are no plans to improve the capability of the medical and police/emergency services to cover the huge number of additional properties proposed in the north east of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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**I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**
The A3 or M25 would have to be improved before any development could be completed. Highways England do not have an plans to look and consider improvements to the A3 until 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) are not viable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to poor air quality concerns (Policy I3)
The size of the development being proposed, particularly in the north east of the borough, will lead to increased congestion and to greater levels of air pollution. This will have a detrimental impact on local residents' health and I have particular concerns for the elderly and children (especially my own children) in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7676  Respondent: 15451009 / Michael Love  Agent:</th>
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I object to not protecting the Green Belt (Policy P2)
I thoroughly object to removing Ripley, Send and Clandon from the Green Belt. I have purposely chosen to buy a house in a village setting within the Green Belt and do not wish to see this consumed by the urban growth of Guildford. There are no exceptional circumstances for these villages and sites to be removed, which is the criteria required by the National Planning Policy to do this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7675  Respondent: 15451009 / Michael Love  Agent:</th>
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I object to the Local Plan as the development proposed is not sustainable (Policy S1)
The volume of houses proposed in the Plan is just not sustainable and will overdevelop the local villages of Ripley, Send and Clandon. The additional housing is not needed by the local area and the infrastructure is not set up to cope. For example, there is no railway infrastructure for Wisley and Garlick's Arch. The roads are already impacted by heavy amounts of traffic and will not be able to sustain the additional vehicles required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the Borough Wide Strategy (Policy S2)</td>
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<td>The council’s proposal to include such a large increase in housing differs from all the other Borough Councils in Surrey and is unbalanced across the borough with too much proposed to the north east of the borough (Wisley/Ripley/Send and Clandon). This seems out of proportion and peculiar particularly as this is Green Belt land.</td>
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<td>I object to the proposed Infrastructure Schedule (Appendix C)</td>
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<td>There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose</td>
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I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3483  Respondent: 15451041 / Iain Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3485  Respondent: 15451041 / Iain Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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<td>This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.</td>
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<td>I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<td>Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clndon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7690   Respondent: 15451041 / Iain Bell   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7691   Respondent: 15451041 / Iain Bell   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/7689</th>
<th>Respondent: 15451041 / Iain Bell</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to the proposed Infrastructure Schedule (Appendix C)</td>
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<tr>
<td>There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/7684</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to not protecting the Green Belt (Policy P2)</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
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<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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| Comment ID: PSLPP16/7686 | Respondent: 15451041 / Iain Bell | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7683  Respondent: 15451041 / Iain Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7687  Respondent: 15451041 / Iain Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7694  Respondent: 15451201 / I Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The lack of proper infrastructure planning for sites (Policy I1)

There are no plans to improve medical and emergency services to cover the proposed developments.

I wish the above objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7693  Respondent: 15451201 / I Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Removal of Green Belt (Policy P2)

Ripley, Send, Clandon and sites at Wisley Airfield (A35) and Garlick's Arch (A43) must not be removed from the Green Belt, I object to the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7692  Respondent: 15451201 / I Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The development proposed is not sustainable (Policy S1)

13,860 new houses will damage local communities by over development, especially Ripley, Send and Clandon. We don't need these houses. The Plan has nothing to improve the infrastructure for the Garlick's Arch area. The Plan takes no account of the effects of the recent referendum which rejected UK membership of the EU arr/may reduce the demand for new housing in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3486  Respondent: 15451233 / Peter Older  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to inform Guildford Borough Council that I object most strongly to the proposed plans for development of the GREEN BELT LAND (Site A46) at Normandy.

This village has already been subject to an enforced housing estate (also built on GREEN BELT LAND) at The Paddocks, I believe that the original intention by the building consortium then (TAYLOR Woodrow) was to build 52 town houses but it was considered to be inappropriate and a mixture of private houses and council-owned bungalows was eventually approved.

We now face another similarly, but much larger, inappropriate proposal by a related consortium (TAYLOR Wimpey) whose sole intention appears to be to increase its profits with little regard to the requirements of the village population.

I am very dismayed about the apparent lack of concern by those responsible for even considering this proposal as it will not only seriously impact on the existing wildlife and footpaths locally, but also to the risk of serious flooding to the whole village.

The traffic situation at Glaziers Lane and Westwood Lane is already at very high levels during peak hours and it will be seriously compounded if this proposed development goes ahead. The two narrow railway bridges already cause concern at present and would become even more dangerous with a significant increase in the resulting traffic situation.

Furthermore, I cannot comprehend the reason for the proposed school in this area considering that the nearest existing schools in either direction are undersubscribed.
Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it.

I have lived in Normandy for 44 years and during that time the village has lost many business premises which have been replaced by housing which I have never objected to because that is progress, and I am not one to stand in the way of progress. However, I object to this current application because I consider that it is certainly not progress, it is greed and it is irresponsible and it should be stopped immediately.

There is little doubt in my mind that those responsible for this proposed project do not live in the village, have no intention of ever doing so, and therefore have little regard for the existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1775  Respondent: 15451457 / Camilla Bell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1776  Respondent: 15451457 / Camilla Bell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3489   Respondent: 15451457 / Camilla Bell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3490  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7703  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7700  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7701  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7705  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7707  **Respondent:** 15451457 / Camilla Bell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7708  **Respondent:** 15451457 / Camilla Bell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to poor air quality concerns (Policy I3)**

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/7698  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**, is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to not protecting the Green Belt (Policy P2)**

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/7699  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**, is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to development in areas which are at risk of flooding (Policy P4)**

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide
development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the
document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the
exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a
river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual
probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7696  Respondent: 15451457 / Camilla Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact
existing local communities by over development, particularly for the villages between Guildford and the M25, including
Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed.
The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit
from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents
will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access
sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure
Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7697  Respondent: 15451457 / Camilla Bell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3487   Respondent: 15451489 / K Shipton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will,

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology I believe is inaccurate; inflating the needs of the borough by distorting student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. **This is not democratic and is not appropriate for consultation of the Plan.**

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3500  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land: all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3502  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. Development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3503  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7721  Respondent: 15451713 / Gaby Attwood  Agent:
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7718  Respondent: 15451713 / Gaby Attwood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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**I OBJECT** to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7727</th>
<th>Respondent: 15451713 / Gaby Attwood</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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**I OBJECT** to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY E6 - The leisure and visitor experience

I OBJECT Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment”. Heritage sites and the Green Belt are particularly vulnerable.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7725  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher
percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford Borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY H3 – Rural Exception Homes**

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages already suffer from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on local roads.

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, West Clandon included, already suffer from traffic congestion. Development around these villages will result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become ever popular, particularly at weekends with hundreds of cyclists passing through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements, as they often need to.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being significant for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents will see their quality of life significantly deteriorate.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is not sustainable.

There is no provision for the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7723  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I worry that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7724  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7716  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and neighbouring villages merging into each other. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7717  Respondent: 15451713 / Gaby Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I am aware that this site often floods during winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**I OBJECT** to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write further to the publication of the above document and write to express my objection to elements of its contents.

My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have “urbanisation” implications far beyond those envisaged by the mantra that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

I object to your proposal to remove a number of classic Surrey villages that currently give the area its charm, beauty, character, history and overall appeal is outrageous.

1. I object to your proposal to remove the Horsleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

1. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

1. I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys. The proposal to build 180 houses in East Horsley and 411 in West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

1. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and drainage. We have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed resident. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

1. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally flawed. The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere else. Surely by interfering with the flood plain in this location can only transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site doesn't become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

1. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to work. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council’s Green agenda. The Council certainly will not be able...
to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

1. I object to the Council’s failure to unlock the development potential of brownfield sites and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of Britain.

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/710  Respondent: 15451841 / Marion Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On infrastructure, the revised plan proposals do not address the additional strain on infrastructure despite the overwhelming objections on this subject in response to the previous consultation. In particular the wording of Policy IDI has been amended to give the impression that provision of adequate infrastructure will be enforced. However, this is not within the gift of GBC, but, in the case of the road network, by Surrey Highways and Highways England both of whom will be influenced by budgetary constraints elsewhere within their jurisdiction. Equally traffic impact assessments will be prepared, and paid for, by applicants and not by GBC and will therefore present a biased outcome in support of any development. I object to the inclusion of all sites other than brownfield sites on the basis that GBC will be unable to secure or enforce the provision of the requisite infrastructure provisions either by negotiation with developers or through other government agencies. Any development must be in current urban or brownfield site areas where there is already an appropriate infrastructure provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/711  Respondent: 15451841 / Marion Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The development of the former Wisley airfield is clearly at odds with revised policy ID3. It is simply not possible to offer a sustainable transport policy for a site which is positioned in this location in the middle of nowhere, with no local amenities, narrow country lanes, no lighting and no public transport facilities. I object to the inclusion of the former Wisley airfield within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/708  Respondent: 15451841 / Marion Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority. I object to the development of new accommodation on the Greenbelt and to the proposal to inset the village of East Horsley and others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1783  Respondent: 15451905 / Jonathan Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/1782  Respondent: 15451905 / Jonathan Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3505  Respondent: 15451905 / Jonathan Withers  Agent:
**I OBJECT** to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two-way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3507  Respondent: 15451905 / Jonathan Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7736  Respondent: 15451905 / Jonathan Withers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/7732  Respondent: 15451905 / Jonathan Withers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/7733  Respondent: 15451905 / Jonathan Withers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/7746</th>
<th>Respondent:</th>
<th>15451905 / Jonathan Withers</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/7742  **Respondent:** 15451905 / Jonathan Withers  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7745</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY H3 – Rural Exception Homes**

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7738</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7739  Respondent: 15451905 / Jonathan Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7741  Respondent: 15451905 / Jonathan Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7730  Respondent: 15451905 / Jonathan Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7731    Respondent: 15451905 / Jonathan Withers    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the...
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Whilst there is a need for affordable homes, I feel the scale being proposed goes over and above the national need, and will require even further development of commercial, industrial and road construction - all of which will increase the irreversible damage to our countryside. Surely we have to set limits and not be seen as NIMBYs but actually people who care about what environment we are leaving for the generations to come?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: Alistair Jackson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Yes, we are fortunate enough to have Green Belt around us, but Green Belt was established to protect our rural areas from this very kind of concrete ambush. By changing the boundaries we will be removing a safety barrier that has protected our area from being smothered by development in Woking, Guildford and Leatherhead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7747</th>
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**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

In my opinion land is being opened up for drastic redevelopment without any consideration for the current infrastructure or facilities, which will not be able to meet the planned demand.

I feel most strongly that I have to object to protect the natural landscape of our area. As someone who commutes by train every day in an effort to reduce traffic pollution, I have found the view of an open field as I approach my destination lifts the stress of having to deal with a substandard railway service somewhat.

In light of the recent political upheaval I believe this plan should be shelved until we have a clearer picture of the needs of the future. To act now could be short sighted and cause irreversible damage unnecessarily. I ask you to consider my objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
issues with the way it considers students and affordability and
flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3510  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.
Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016. Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/3512</th>
<th>Respondent: 15451969 / Rosie Lee</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
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<td>The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.</td>
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<tr>
<td>The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.</td>
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<tr>
<td>This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Comment ID: PSLPP16/7758  Respondent: 15451969 / Rosie Lee  Agent:</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/7755  Respondent: 15451969 / Rosie Lee  Agent: |
|---|---|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7756  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7757  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7765  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY E6 - The leisure and visitor experience</th>
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</table>

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7763</th>
<th>Respondent: 15451969 / Rosie Lee</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7764  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7761  Respondent: 15451969 / Rosie Lee  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

I walk my 3 children to Clandon School (along The Street in West Clandon - the A427) every day and have recently stopped doing this as the footpath is so narrow in places it is too dangerous. Lorries frequently mount the curb to pass one another with no consideration for pedestrians. Just this week (Tuesday 12th July) 2 cars collided on The Street in West Clandon and both ended up across the footpath. Fortunately noone was hurt this time. It is not safe now. Further increase in traffic will result in more accidents and certainly fatalities.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7751   Respondent: 15451969 / Rosie Lee   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7762   Respondent: 15451969 / Rosie Lee   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7759  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7748  Respondent: 15451969 / Rosie Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to not protecting the Green Belt (Policy P2)

I object to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy Framework clearly states that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt as mere housing need does not constitute a ‘special circumstance’.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The Green Belt was put in place to prevent this very thing from happening and ignoring this policy is unthinkable. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7749  Respondent: 15451969 / Rosie Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15452033 / Ellen Jackson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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The immediate shortage of suitable facilities for the increase in population alone is reason to be wary of this plan that seems ill thought out at best; but the damage this will do to our village, the environment, the birds and endangered bees; the increase in air, light and noise pollution, and the impact all this will have on our future has to be reason enough to halt the plans and reconsider.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/7769</th>
<th>Respondent: 15452065 / Fiona Jackson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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I am writing to register my objection to the Local Housing Plan. As someone aged between 18 and 28 I feel that I can object despite clearly being in the category that needs help to get on the housing ladder.

As an employee of the NHS System I am clearly going to struggle for some time to be able to afford my own home on the salary I receive and am still living with my parents as a result, and yet I object to the plan to erode the Green Belt I have grown up in and love - all under a claim to be helping people like me.

I do not feel that this simply building over the nearest open spaces is the answer in the long term - and a lot of Government decisions are made on short term financial winning basis rather than what will actually be good for my generation or that of my future children. The Environment is always overlooked and surely this is what we should be focussing on for the health of the country to come.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Page 1220 of 2543
The re-designation of our small parade of shops to 'District Centre' is surely misleading as that implies 'a group of shops separate from a TOWN centre' when surely we are a 'Local Centre'? This labelling can only imply that the retail facilities are greater than they currently are?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/7770  Respondent:  15452065 / Fiona Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Current infrastructure surely couldn't support further housing and transport needs - very few of the local roads have pavements which enhances our rural aspect to the village, but will surely make the roads even more of a risk if the number of cars on the roads is increased. The few pavements that we do have are very narrow and we are often at risk of being hit by wing mirrors from lorries that pass by, as the roads are too narrow for two vehicles to pass each other and give room to pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/7771  Respondent:  15452065 / Fiona Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst appreciating the need for affordable homes, I fear this erosion of our green belt will be detrimental for the future. Open countryside needs to be protected around towns for the good of the environment and the nation's physical and mental health. As a parent of a teenager who has suffered greatly with the latter I recognise the importance of having green open spaces within easy walking distance where one can lose oneself in the freedom of nature. A city park, or fenced in recreation areas just won't 'cut it'. We have to protect our natural countryside before it is lost forever.

I strongly urge you to reconsider this plan and consider my strongest objection to it

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7768  Respondent: 15452065 / Fiona Jackson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been compelled to write after studying the new Local Plan that I understand is to be put forward for serious consideration. This new plan concerns me greatly as I feel it will change the village beyond all recognition and something we treasure will be lost, and as far as I can tell there appears to be no sound reason behind the changes to the boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1789  Respondent: 15452129 / Mcandrew Watts  Agent: Hunter Page Planning (Gary Llewellyn)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Introduction

1.1 These representations are submitted on behalf of McAndrew Watts, a prospective purchaser (referred to as the Promoter) of a large area of land to the rear of 5 existing detached properties (Ashley Cottage, Silkmore, Willowpond, Goodwood and Two Chimneys) that front Silkmore Lane, West Horsley. The acquisition of the land would be subject to receipt of a satisfactory planning permission.

1.2 As assessment has been made of the village as a location suitable for development. The Borough Council’s Settlement Profiles (July 2013) indicates that, although the village has an average sustainability ranking as it does not contain many key services, its proximity and close relationship to East Horsley, including the sharing of services, means that, together, they are effectively one continuous settlement. The document advises that the combined geographical spread (i.e. critical mass) and populations (East Horsley: 3785 people and West Horsley: 2828 people) is significantly larger than other villages in the Borough and contain a higher number of key community services and facilities making it the most sustainable rural settlement in the Borough. The document further advises that the area could support additional housing development in the future if suitable sites are found. In order to achieve this the advice is that the settlement boundary would need to be amended. This approach accords with the advice of the NPPF (See Paragraph 5.5) and the settlement (Green Belt) boundary has been changed. In both cases, the Promoter supports the Borough Council’s decision.

2. Planning Strategy for West Horsley (South)

2.1 The Submission Local Plan, through its Spatial Vision and Borough Wide Strategy (Policy S2), indicates that there is the need to deliver 13,860 additional homes by 2033. The location for this housing includes both urban and rural areas. It is proposed, for instance, to allocate 1200 dwellings on non-strategic sites within and around existing villages, some of which
are now inset from the Green Belt, and over 750 dwellings as extensions to existing villages. The Submission Local Plan advises that these dwellings can offer a variety of housing choice in villages and help contribute to supporting local services and the important role they play in village life.

2.2 The village of West Horsley was, historically, washed over by the Green Belt designations. It is now, however, is identified on the Key Diagram/Policies Map as being “white” and thus an “area inset from the Green Belt”. It is also shown on the Diagram/Map as being outside the Area of Outstanding Natural Beauty. This means that the village is no longer subject to the need to maintain the openness of the Green Belt or constrained by the very important national landscape designation.

2.3 The West Horsley (South) Inset Map indicates that the village has a Conservation Area and an Area of High Archaeological Potential. A Site Allocation (A37) is identified at the southern end of the village and is deemed suitable to accommodate around 40 homes.

2.4 The Promoter supports the provisions of Policy S1 (Sustainable Development). The allocation of land for housing development in the village confirms that it is a suitable and sustainable location.

2.5 The provisions of Policy H1 (Homes for All) is supported by the Promoter. The reasoned justification for the policy (Paragraph 4.2.5) acknowledges the Borough Council’s support for an appropriate mix of homes in villages. It also accepts that although new development must be in keeping with the character of the surrounding area this does not preclude the delivery of smaller units as these are capable of being designed in such a way that respects the prevailing built form.

2.6 The Promoter’s main concern, and thus principal objection to the wording of the Policy, is that in promoting “Housing Mix” it does not permit the net loss of existing/allocated housing. The situation is such that the loss of an existing house or couple of houses could act as enabler to the redevelopment of land to the rear i.e. a backland site that is effectively landlocked.

2.7 The Promoter objects to the allocation of the land (Policy A37) to the rear of Bell and Colvill, Epsom Road, West Horsley on the grounds that, although it seeks to utilise some brownfield land (being an existing car showroom and workshop and two detached dwellings (Braeside and Bijou)), a large proportion of it is located in the village’s Conservation Area. This is deemed to be a significant constraint which is not helped by the fact that the site suffers from surface water flood risk a well, as acknowledged by the Borough Council. Moreover, other relevant issues include the loss of employment land (B2/Sui generis), given its association with the sale and repair of cars, and the presence and potential loss of a number of mature trees.

3. Promotion of land for development

3.1 The Promoter’s land is 2ha in area and comprises of a number of fields adjacent to each other. The attached Location Plan confirms its location and extent. The plan also provides an indication of possible points for vehicular access, to bring the land forward for development, and this would involve the demolition of one of the existing houses, excluding Silkmore being the listed building.

3.2 The land is surrounded on three sides (to the north, east and south) by existing built development. The remaining boundary (west) is defined by existing mature hedges and other boundary treatments.

3.3 The dwelling, Silkmore, was designated a listed building (Grade II) in June 1967. It occupies a substantial plot, with landscaped gardens. The house has been subject to alterations in both the 19th and 20th centuries.

3.4 The area is predominantly residential in character. The other existing dwellings along the east side of the land are all modern in age being built in the mid 1960’s (Willowpond) and mid 1980’s (Ashley Cottage) respectively.

3.5 The adjacent road, Silkmore Lane, is unclassified. It has a semi-rural appearance being formed of a tarmac carriageway with grass verges either side.

3.6 The West Horsley (North) Inset map confirms that the land is located outside the village’s Conservation Area and Area of High Archaeological Potential. It is also neither in Flood Zone 2 nor Flood Zone 3 according to the Environment Agency Flood maps.
3.7 The West Horsley (North) Inset map confirms that the land is located outside the village’s Conservation Area and Area of High Archaeological Potential. It is also neither in Flood Zone 2 nor Flood Zone 3 according to the Environment Agency Flood maps.

4. Conclusions

4.1 The Promoter agrees with the Borough Council that, in order for them to meet their housing requirements, the village of West Horsley (North) is both a suitable and sustainable location for new housing development. He supports, therefore, the provisions of both Policies SD2 and H1. In saying that, however, he is not convinced that the land identified for housing purposes under Policy A37 is the right choice given its environmental sensitivity.

4.2 The land identified by the Promoter had very good potential for development, including housing. It is devoid of any significant constraints and is located outside the designated heritage assets. The setting of the listed building is accepted as being a key factor for consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Guildford BC Submission Local Plan West Horsley Representation July 2016 Plan.pdf (2.0 MB)

Comment ID:  PSLPA16/1791  Respondent:  15452193 / Susan Hibbert  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to state my objection to Guildford expanding by a quarter over the period of the proposed local plan. I believe that the housing target is set too high, based upon flawed data, and I object to the fact that GBC has declared that it will not be applying constraints - when every other Surrey borough has done so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7777  Respondent:  15452193 / Susan Hibbert  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is essential to apply constraints in order to protect the unique character of Guildford, which unconstrained development will ruin.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also feel that the type of development has not been sufficiently thought through; in the town centre we need homes rather than yet more shops and, in particular, more affordable starter homes for young couples and specialised housing for the elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford has a crying need for better infrastructure, especially regarding transport, and it is essential that this is prioritised in the plan and delivered before or absolutely in parallel with any other development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I appreciate that Guildford urgently needs a local plan in order to develop coherently and to prevent inappropriate (and in the case of the Solum application for the railway station, one could say 'disastrous') speculative development, but it has to be the right plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1792  Respondent: 15452257 / Elissa Hutchinson-Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: GUILDFORD BOROUGH COUNCIL - LOCAL PLAN : STRATEGY AND SITES.

I write further to the publication of the above document and write to express my objection to elements of its contents.

My principle overarching objection is the proposal co take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have "urbanisation" implications far beyond those envisaged by the minister that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

1. Your proposal to remove a number of classic Surrey villages that currently give the area its charm, beauty, character, history and overall appeal is outrageous.

1. I object to your proposal to remove the Horleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing that. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

1. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure opportunities. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

1. I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys is completely out of keeping with their village status. The proposal to build 80 houses in East Horsley...
and in West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

1. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and we have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

1. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally flawed. The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere. Surely by interfering with the flood plain in this location can only transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site it doesn't become viable for 100 houses. The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

1. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in a rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council's Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

1. I object to the Council's failure to unlock the development potential of brownfield sites and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of Britain.

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

I reiterate my unreserved objection to the proposals as set out in the above document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3516  Respondent: 15452289 / Claire Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation,
impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2953  Respondent: 15452289 / Claire Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35 in the draft Local Plan for the following:

1. It is the least sustainable strategic site identified because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to Junction 10 (M25) one of the most congested junctions in the country.
4. Local roads are at capacity, particularly when the SRN is not free-flowing due to accidents, diversions, roadworks etc.
5. Any public transport provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
6. There is insufficient employment available onsite and almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk or cycle on narrow unlit local roads on a regular basis.
7. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.
8. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints (notably the provision of sewerage capacity).
9. I object to the Council wasting tax payers and residents’ time and money and not following due process, and indeed ignoring previous representations.

For the reasons above and numerous other reasons, this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3523  Respondent: 15452385 / Alasdair Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
**Environmental Impact of Proposed Housing in Horsley: Flood Risk**

Building the large numbers of houses proposed in the Draft Local Plan will significantly increase the risk of flooding. I strongly object to the proposal in the Draft Local Plan for housing development in Ockham Road North, adjacent to Horsley station. This housing would be located in a floodplain. Housing on this site will adversely affect local drainage patterns, having a knock on effect further down the drainage basin. Increase in the volume of run-off due to paving over of arable land, coupled with higher incidence of flash-flooding caused by Global warming, will result in a greater frequency of abnormal fluvial discharge events, beyond the capacity of the existing drainage system. This will increase the likelihood of homes in the vicinity being flooded.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7796  **Respondent:** 15452385 / Alasdair Good  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**The Impact of Additional Residential Housing and Population Increase on Local Facilities**

I strongly disagree with the premise in the GBC Local Plan 2016 that Okham and the Horsleys are a suitable location for a large number of additional new houses. The housing numbers proposed for Guildford Borough are for 13040 homes over 15 years from 2016 to 2031. This number is too high. The number is based on a Strategic Housing Market Assessment (SHMA), which the council required to be amended by the Head of Planning. This amendment has not taken place and therefore the number of new builds proposed in the Draft Local Plan has no basis. I object to Guildford Council proposing a Draft Local Plan on the basis of flawed evidence.

As an inhabitant of West Horsley I know at first hand the existing population pressure on local facilities. The primary school in our neighbourhood (The Raleigh) is oversubscribed, in common with the local secondary school, the Howard of Effingham.

The local medical centre is also filled to capacity. Residents of adjacent villages e.g., Ripley, East and West Clandon also use the centre. As a consequence, new residents to the village are known to register with alternative practices e.g., Bookham. In conclusion, the village services that currently exist in the Horsleys are already filled to capacity and do not have the facilities to accommodate the large number of new residents which would result from the increase in residential housing proposed in the Local Plan.

**Impact of Increased Residential Population on Transport**
An increase in the number of residents would result in a heavy increase in both construction related traffic and subsequent traffic arising from an increase in local population.

Most residents of the Horsleys work outside the villages. They either commute into London or Guildford by train, or travel by road to places of work and education. There are very few indigenous employment opportunities in the Horsleys. Essentially they are commuter dormitories. The residents of proposed additional housing are unlikely to be employed in the immediate vicinity of the Horsleys. They will therefore join existing commuters travelling either by road or rail. Horsley station car park is already filled to capacity, and there is no option to extend the car parking facilities for the station. The land is not available for expansion. Likewise, at Effingham Junction, there is little land to spare for additional parking facilities. I would conclude, therefore, there is limited potential for additional commuters to park at the local stations and commute by train. I might add, that Horsley station already serves as a rail hub for adjacent villages (e.g., Shere and Ripley), resulting in heavy road usage at peak commuting time. The housing development proposed in the Local Plan will increase the traffic volume through the village, resulting in additional air and noise pollution.

Key road links to the Horsleys focus on the A246, from Leatherhead to Guildford, and additional rural (narrow and winding) roads linking the villages to Ripley, Cobham and the A3/M25. The A246 currently carries a very high volume of commuter traffic at peak periods creating bottle necks and traffic congestion at both the Givons Grove roundabout on the Leatherhead bypass, and the Merrow roundabout on the outskirts of Guildford. The A3 likewise carries a heavy flow of traffic both into Guildford and north to the M25 at peak hours, with stationary traffic a frequent occurrence. The construction of additional housing in a rural area, which by its location and nature, requires inhabitants to travel predominantly by car, will exacerbate an already congested road network. This will clearly have safety implications, as more congested narrow, rural roads will result in a greater frequency of road traffic accidents and undoubted loss of life. It will also increase traffic congestion in local employment hotspots such as Guildford, and Leatherhead.

It makes much more sense to redevelop brownfield sites in Guildford and Woking to accommodate additional housing needs. This would have the advantage of providing new residents with the option of using the existing public transport network, or walking or cycling to work or school. They would also have a full range of urban facilities on their doorstep.

In conclusion, I strongly object to the new housing proposals outlined in the Draft Local Plan.
There are five legal reasons for protection of land assigned as Green Belt:

1. To check the unrestricted sprawl of large built up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The provision of the Green Belt in the vicinity of the Horsleys meets the criteria listed above. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. In addition, the existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need (i.e., such protected land is a legal constraint against any such development). The proposed Local Plan has not demonstrated exceptional circumstances requiring additional housing in the vicinity of East and West Horsley. Removal of villages from the Green Belt is a legal constraint against such development.

I strongly disagree with and object to the assumption made in the Proposed Submission Plan that it is reasonable to remove villages such as West and East Horsley from the Green Belt. It seems remarkable that a single act of Parliament by the current Government can undo the good work for the provision of the Green Belt and protection of rural England laid out in the Town and Country Planning Act of 1947. The rationale behind the need to protect rural areas in close proximity to ever growing metropolitan areas is more relevant today than ever, in light of the projected growth in UK population.

I object to the method of defining settlement hierarchy as described in the Proposed Submission Local Plan. In particular, I take exception to the "classification" of East Horsley as a "Semi Urban village" and question the basis for this classification. Horsley lacks most of the infrastructure and community facilities taken for granted in an urban area. The key charm and attraction of Horsley is essentially its rural character.

To accrete large numbers of new houses to the Horsley - Okham area would change the character of these ancient villages permanently, resulting in a detrimental impact on the environmental and village character. I therefore object to the proposed settlement boundary changes in East and West Horsley.

In summary, I strongly object to the proposal in the Proposed Submission Local Plan to take the following villages out of the Green Belt: East Horsley and West Horsley (North), Effingham, Ripley, Shere and West Horsley (South).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1794  Respondent: 15452449 / Carl Sjogren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3524  **Respondent:** 15452449 / Carl Sjogren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath's Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the...
countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/7797 | Respondent: 15452449 / Carl Sjogren | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/7798 | Respondent: 15452449 / Carl Sjogren | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Proposed Submission Local Plan - Site Policy A35 and Site Policies A36, A38, A39, A40 and A41.

I am writing to OBJECT to the Proposed Submission Local Plan in relation to the above Site Policies for the following reasons:

1. **Traffic**

I live in a house just off Ockham Road South, on the bend just to the south of the shops, so I am familiar with the current traffic which uses Ockham Road South and Ockham Road North (together "Ockham Road").

Ockham Road is the route between the Wisley Roundabout and the A246, and as such takes traffic from the M25 and the A3 to the south towards Dorking, Horsham and areas to the south of Guildford, and vice versa. There is therefore a substantial number of HGVs using this road, which was never designed to carry heavy traffic. Along a substantial part of its length it is difficult if not impossible for an HGV or a bus to pass a car going in the opposite direction. Outside my house, the road is so narrow that there is no centre white line, and even cars have difficulty passing each other.

More recently, with a substantial increase in the number of cyclists in the Surrey Hills area, their presence on the narrow roads in the Horsleys contributes to the difficulty in maintaining safe and smooth traffic flows.

If the above policies are approved the traffic flow along Ockham Road will be very substantially increased. 493 new houses in the Horsleys and a further 2,000 houses in Site A35 (former Wisley Airfield) will all have to use Ockham Road for access, and would have a substantial effect on not only Ockham Road but also on the Wisley roundabout, which is already very busy. It is not unreasonable to assume that on completion of all of the above developments there would be at least 3,400 additional cars using Ockham Road.

The inclusion of these Sites in the proposed Local Plan is therefore contrary to Policy I3 (Sustainable Transport for New Developments) and Policy I1 (Infrastructure and Delivery), since there are no proposals which seek to address this problem.

2. **Infrastructure**

It is generally accepted that the local schools and the Horsley Medical Centre are functioning at the limit of their capacity, and cannot cope with further local development such as is now proposed in the draft Local Plan. It is also the case that the Horsley Station car park is fully utilised during weekdays, and cannot provide further parking facilities for commuters.
Whilst the Proposed Submission Local Plan does indeed envisage the provision of additional schools and a new surgery on Site Policy A35 (former Wisley Airfield), these will only become available if/when this site is fully developed. Consequently, there can be no guarantee that they will be available when the five Horsley sites (and other nearby sites) are developed - and this is likely to happen within a very much shorter time frame.

There do not appear to be any proposals which provide for additional parking facilities required in the neighbourhood of Horsley Station, nor any assurance or means whereby the provision of extra medical facilities or schooling can be secured so as to be available on completion of the proposed developments in the Horsleys. Whilst an obligation on developers to pay CIL would provide partial funding, action needs to be taken and money needs to be spent before development takes place.

In the absence of a fully thought-out proposal the inclusion of the above sites in the Proposed Submission Local Plan is premature, and is contrary to Policy I1

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: PSLPS16/3531  Respondent: 15453889 / Teresa Van Den Bosch  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated area of Outstanding Natural Beauty.
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running thorough local roads
- Add to Guildford’s pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: pslp172/3706  Respondent: 15453889 / Teresa Van Den Bosch  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I support the removal of site A46-1,100 homes and school (land to the south of Normandy and north of Flexford) and removal of site A47-50 homes (land to the east of the Paddocks, Flexford)

which is in Green Belt land and would overwhelm the local infrastructure, especially roads and healthcare and put extra pressure on the electricity supply, sewage and waste water services and increase vulnerability to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site which contribute to the 'openness' of the Green Belt.

I also object to the assertion in Policy P2 Green Belt para 4.3.13 that Normandy and Flexford are now inset from the Green Belt which effectively redraws the Green Belt boundary with no evidence provided of the 'exceptional circumstances' required. I feel it is important for the two settlements of Flexford and Normandy to remain 'washed over' by the Green Belt so they may maintain their separation and unrestricted views out to the surrounding countryside to support the 'openness' of the Green Belt. Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected to check the unrestricted sprawl of built up areas, to safeguard the countryside from encroachment, to prevent neighbouring towns from merging into one another and to encourage the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running thorough local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1857  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3684  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3646  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3644  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7947  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7896  Respondent: 15454465 / Marissa Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.</td>
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<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.</td>
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</table>
1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3682  Respondent: 15454497 / Rick Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3604  Respondent: 15454497 / Rick Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3607  Respondent: 15454497 / Rick Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3647  Respondent: 15454497 / Rick Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3643  Respondent: 15454497 / Rick Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7906  Respondent: 15454497 / Rick Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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Attached documents:

Comment ID: PSLPP16/7945  Respondent: 15454497 / Rick Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7895  Respondent: 15454497 / Rick Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

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Attached documents:

Comment ID: PSLPA16/1855  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3686  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3681  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3603  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Burnt Common, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3608  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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Attached documents:

Comment ID: PSLPP16/7944  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7894  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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Attached documents:
Comment ID: PSLPP16/7847  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1854  Respondent: 15454561 / Charles Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3689  Respondent: 15454561 / Charles Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
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Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3679  Respondent: 15454561 / Charles Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3602  Respondent: 15454561 / Charles Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3609  Respondent: 15454561 / Charles Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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Comment ID: PSLPS16/3680  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3601  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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Comment ID: PSLPS16/3610  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPP16/7942  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7892  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Local air quality is known to be poor. This is principally due to the congestion on the SRN with both the A3 and M25 at a standstill during peak hours. Residents of the proposed development (5100) will rely on the private car as the local roads, which are narrow and windy and unlit are not suitable for cycling or walking, nor are they suitable for public transport. An additional 4000 cars will make the local roads, which are already under pressure more congested as residents travel to work, school etc.</td>
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I cannot see how any proposal for Suitable Alternative Natural Green Space can possibly mitigate the damage caused to the natural habitats of the bats, ground nesting birds, invertebrates, reptiles and flora and fauna by additional residents and their pets. It remains very uncertain how this can be controlled.

A development of this scale will have a huge impact on light and noise pollution which will affect both local residents and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/1850</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3598   Respondent: 15454657 / Tracy McGuigan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3613   Respondent: 15454657 / Tracy McGuigan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3653   Respondent: 15454657 / Tracy McGuigan   Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3637   Respondent: 15454657 / Tracy McGuigan   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7912   Respondent: 15454657 / Tracy McGuigan   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

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Page 1265 of 2543
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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Attached documents:

| Comment ID: PSLPS16/3597  Respondent: 15454689 / Dave Herbert  Agent: |
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| Comment ID: PSLPS16/3614  Respondent: 15454689 / Dave Herbert  Agent: |
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7858  Respondent: 15454689 / Dave Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1848  Respondent: 15454785 / Fiona Hodges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3693  Respondent: 15454785 / Fiona Hodges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: PSLPS16/3655  Respondent: 15454785 / Fiona Hodges  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3635  Respondent: 15454785 / Fiona Hodges  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

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Comment ID: PSLPP16/7915  Respondent: 15454785 / Fiona Hodges  Agent: 

Page 1271 of 2543
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Comment ID: PSLPP16/7860  Respondent: 15454785 / Fiona Hodges  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1847  Respondent: 15454849 / Charlotte Murphy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3694  Respondent: 15454849 / Charlotte Murphy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3672  Respondent: 15454849 / Charlotte Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3595  Respondent: 15454849 / Charlotte Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/3616  Respondent: 15454849 / Charlotte Murphy  Agent:
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/7917  Respondent: 15454849 / Charlotte Murphy  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID: PSLPP16/7933  Respondent: 15454849 / Charlotte Murphy  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7884  Respondent: 15454849 / Charlotte Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Attached documents:

Comment ID: PSLPP16/7863  Respondent: 15454849 / Charlotte Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3493  Respondent: 15454881 / Mark Fielder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst the Infrastructure Schedule sets out the key infrastructure requirements upon which the plan depends, there appears to be no schedule for Garlick’s Arch (A43). This indicates that the Plan takes no account of the infrastructure required for this site. As a result of this omission it is not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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As a result of the council refusing to publish the contents of the SHMA report the reported figure of 693 houses cannot be verified- this shows a distinct lack of transparency and hampers an effective and full consultation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Comment ID: PSLPS16/3671  Respondent: 15454881 / Mark Fielder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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Attached documents:

Comment ID: PSLPS16/3594  Respondent: 15454881 / Mark Fielder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.
Garlick’s Arch is protected from development as Green Belt. As stated by central government policy, the need for new housing is not accepted as an exceptional circumstance as such the stated areas should not be removed from the Green Belt (Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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Attached documents:

Comment ID: PSLPS16/3633  Respondent: 15454881 / Mark Fielder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPP16/14574  Respondent: 15454881 / Mark Fielder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Due to the proposed development of Garlick’s Arch (A43) the built area in the locality would double. There would be irrevocable damage the character of the Ancient Woodland on the site, which includes a significant number of ancient oak trees. This is a resources that would be potentially lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14575  Respondent: 15454881 / Mark Fielder  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The provision of new industrial sites at Garlick’s Arch (A43) is not needed there is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14572  Respondent: 15454881 / Mark Fielder  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no plan to tackle the inevitable increase in traffic as a result of the developments. The local villages already suffer heavy traffic an increase in dwellings will only compound this problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14576  Respondent: 15454881 / Mark Fielder  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is clear that improvements to the M25 and the A3 would be required before any proposed development takes place, this clearly cannot be carried out within the proposed timeframe. Any developments proposed for the Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) sites should not take place without the appropriate improvements to main infrastructure routes. It has been stated by the highways agency that they will not consider improving the A3 until 2020.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

The removal of Ripley, Send and Clandon from the Green Belt. The National planning policy requires special circumstances to be present – there are no special circumstances evident. I therefore object on this basis. Brownfield site development around Burnt common is a far more logical approach rather than damaging the environment by building and subsequently by increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/7932</th>
<th>Respondent: 15454881 / Mark Fielder</th>
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</table>

Flooding needs to be taken into account in the development plans, especially in the case of Garlicks Arch (A43). This area has flooded on more than one occasion and is already marked as a risk area by the Council's own assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/7883</th>
<th>Respondent: 15454881 / Mark Fielder</th>
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1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed construction of some 13,860 new houses – it will damage local communities by over development, especially Ripley, Send and Clandon and as such is completely unsustainable. There are no rail infrastructures that serve either Garlicks Arch (A43) or Wisley Airfield (A35) and there is clearly inadequate bus services. This is likely to result in greater car traffic as most adults will require vehicular access, yet there appears to be no infrastructure improvement for Garlick’s Arch currently. The development of more urban areas and other brownfield sites makes far more sense in terms of sustainable transport reuse of ‘brown’ sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Guildford Borough Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the 
SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3696  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally 
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 
homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3670  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally 
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 
homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3593  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally 
Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3631  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7919  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7931  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7882  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7866  Respondent: 15454913 / A Burston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3605  Respondent: 15454945 / Claire Cassar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule defines the key infrastructural requirements upon which the plan is dependent. However, no such schedule for Garlick’s Arch (A43) is apparent. This would lead me to conclude that that the Plan does not take account of the infrastructure required for this site. As a result of this omission the plan is not viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1844  Respondent: 15454945 / Claire Cassar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3604  Respondent: 15454945 / Claire Cassar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the figure of 693 houses per annum in the borough. This number is too high (Appendix D).

As a consequence of the council’s refusal to publish the contents of the SHMA report, the alleged figure of 693 houses cannot be validated—this demonstrates a distinct lack of transparency and hampers an effective and full consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3697  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3669  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3592  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6907  
Respondent: 15454945 / Claire Cassar  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Garlick’s Arch is protected from development as it is classed as a Green Belt area. As stated by central government policy, the need for archnew housing is not accepted as an exceptional circumstance. Consequently, Garlick’s should not be removed from the Green Belt (Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3621  
Respondent: 15454945 / Claire Cassar  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3661  Respondent: 15454945 / Claire Cassar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3630  Respondent: 15454945 / Claire Cassar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15095  Respondent: 15454945 / Claire Cassar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch site includes ancient woodland comprising a substantial number of ancient oak trees. This woodland would be lost from our local heritage. The magnitude of the proposed development of Garlick’s Arch (A43) would comprise the environmental impact resulting in the loss of our local heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15096  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The provision of new industrial sites at Garlick’s Arch (A43) is not required. Existing brownfield industrial site at Burnt Common would provide a viable alternative, with capacity to accommodate the 7,000 sq m proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15093  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There has been no consideration given to the increase in traffic as a result of the proposed developments. The increase in the number of residences will further impact negatively on local villages already suffering as a consequence of heavy traffic and traffic congestion, particularly at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed timeframe for the development are not aligned with the time it would take to effect improvements to the M25 and the A3. Any developments proposed for the Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) sites need to take account of improvements to main infrastructure routes, ahead of the developments commencing. Highways agency assert that they will not consider improving the A3 until 2020.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The National planning policy requires special circumstances to be present – there are no special circumstances evident with reference to the removal of Ripley, Send and Clandon from the Green Belt.

Brownfield site development around Burntcommon would provide a much more sustainable approach and reduces the environment damaging likely to result from the proposed building plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7880  Respondent: 15454945 / Claire Cassar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15090  Respondent: 15454945 / Claire Cassar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed construction of approximately 13,860 new houses will have negative impact on local communities by over development, especially Ripley, Send and Clandon. Therefore the proposed development is untenable and practicably unsustainable. Interestingly, there appears to be no infrastructure improvement plan for Garlick’s Arch. Currently there is no rail infrastructure that supports Garlick’s Arch (A43) or Wisley Airfield (A35) and current bus service coverage is found to be inadequate. This lack of public transport will result in greater car traffic as most adults will require vehicular access.
The development of more urban areas and other brownfield sites makes far more sense in terms of sustainable transport reuse of 'brown'sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the development of 45 houses at Clockbarn Nursery, as Tannery lane is narrow and unsuitable for any additional amount of traffic, the junctions onto Send road is already difficult, hazardous and dangerous at times. This on top of the existing granted planning permission would be a very poor decision to allow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3563  Respondent: 15454977 / Graham Hook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the development of the 45 houses at Clockbarn Nursery, as Tannery lane is narrow and unsuitable for any additional amount of traffic, the junctions onto Send road is already difficult, hazardous and dangerous at times. This on top of the existing granted planning permission would be a very poor decision to allow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3564  Respondent: 15454977 / Graham Hook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to proposed new slip roads to the A3 even though I can see it might make it easier for me at times, but for the area as a whole and local people it would make life and travel more than difficult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/3566</th>
<th>Respondent: 15454977 / Graham Hook</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT to the development of 40 houses and 2 traveller pitches at Send Hill, this again is an inappropriate location as the roads leading to it are narrow and of single width which would not provide adequate access. The site is also an old landfill site which to deemed to be unsafe.

An article on the local radio recently stated that Surrey council had identified a significant shortfall in the number of school places, thousands! Over the coming years where are all the new children be going to go to school, not to mention over stretched doctors, hospitals etc etc as the whole area seems to be awash with new proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
<th>Comment ID: PSLPP16/7841</th>
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I'm writing to object to the proposed local plan. I OBJECT to the removing the local villages from the green belt as this goes against all recent promises to retain the green belt and keep it intact. The outcome in my view would be the lose of the villages as individuals, as fill would undoubtedly link them all and become one, creating areas not villages. The local council promotes Guildford as being a vibrant town set amongst its rural country side and towns and villages. Ok the town might stay the same but what would make people want to visit if it is just another town among others and sprawling housing, because that would become the situation, you don't have to look far to see the reality, and would you want to visit there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7842  Respondent: 15454977 / Graham Hook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that no thought or provision seems to have been given to how the area will cope with the lack of doctors, hospitals, schools, roads and all the other infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1843  Respondent: 15455009 / Emma Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3698  Respondent: 15455009 / Emma Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3668  Respondent: 15455009 / Emma Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3591  Respondent: 15455009 / Emma Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick’s Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1841   Respondent: 15455073 / Amanda Fletcher   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3699   Respondent: 15455073 / Amanda Fletcher   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3667   Respondent: 15455073 / Amanda Fletcher   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<p>| Comment ID: PSLPS16/3663 | Respondent: 15455073 / Amanda Fletcher | Agent: |</p>
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Comment ID: PSLPP16/7927  Respondent: 15455073 / Amanda Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7877  Respondent: 15455073 / Amanda Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7873  Respondent: 15455073 / Amanda Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1840  **Respondent:** 15455105 / Kate Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3700  **Respondent:** 15455105 / Kate Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3666  **Respondent:** 15455105 / Kate Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

---
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3589  Respondent: 15455105 / Kate Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3624  Respondent: 15455105 / Kate Robinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Answer (if comment is on questions 1-7 of the questionnaire): ()
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Comment ID: PSLPS16/3664  Respondent: 15455105 / Kate Robinson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/3626  Respondent: 15455105 / Kate Robinson  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

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Comment ID: PSLPP16/7924  Respondent: 15455105 / Kate Robinson  Agent: 
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7875  Respondent: 15455105 / Kate Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Attached documents:

Comment ID: PSLPS16/3568  Respondent: 15455169 / R P Saggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We very strongly object to building on Green Belt Land

We strongly object to plan A46, the proposed housing development in Normandy/Flexford

We also strongly object to large scale housing developments in Normandy

We object to the construction of a new large school in view of the fact that schools in the area are under-subscribed

We object to our rural environment being destroyed

We also object to this proposal as it will greatly affect views, wildlife, flooding, and local infrastructure will not be able to cope with this scale of development. Therefore, the needs of Normandy/Flexford residents are being undermined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1852  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3688</th>
<th>Respondent: 15455201 / Edith Dadswell</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/3677</th>
<th>Respondent: 15455201 / Edith Dadswell</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID: PSLPS16/3599 | Respondent: 15455201 / Edith Dadswell | Agent: |</p>
<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3612  Respondent: 15455201 / Edith Dadswell  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3652  Respondent: 15455201 / Edith Dadswell  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3638  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7911  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7940  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick’s Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7890  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7854  Respondent: 15455201 / Edith Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/1816  **Respondent:** 15455233 / Andrew Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1817  **Respondent:** 15455233 / Andrew Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3569  **Respondent:** 15455233 / Andrew Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Page 1319 of 2543
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3570  Respondent: 15455233 / Andrew Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/7862</th>
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<th>15455233 / Andrew Hamilton</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPP16/7865</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages are currently barely able to cope and I therefore cannot understand how they can be expected to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from any railway stations within easy walking distance and the local bus services are already inadequate. Residents will have no option but to be reliant on motor vehicles. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from severe congestion. Further vehicle movements will result in even more acute congestion and potential grid-lock and hence much greater risks from pollution created by stationary cars. The health of residents and the local environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1815   Respondent: 15455297 / Alex Lawton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: Objection "Send Housing Developments & Destruction of Green Belt

Green Belt: I was absolutely appalled to read that you would contemplate taking the villages of Send & Ripley out of the green belt. We voted for a Conservative Council to protect our rights, not blatantly ride roughshod over them. The very mention of losing the greenbelt status in our little village is a betrayal of what we thought you stood for and I strongly object to this.

Apart from destroying the a quiet village environment, there is currently greenbelt land at the end of Send Hill that was divided into hundreds of plots and sold off to individuals on the premise that one day it may lose its green belt status. If the green belt were to be removed the flood gates would be opened to wipe out our village life and destroy our community.

Send Hill New Housing A44 .1.9 ha: 40 x houses and 2 x traveller pitches on Send Hill, which is known as highly desirable prime semirural and much sought after location , is the most unbelievable part of the plan. It is a dangerous road at the best of times with our road at the end where you propose building housing narrowing to a single track with a lethal blind corner. Also it would increase traffic to an unacceptable level. I strongly object.

Lastly, the properties you are proposing would have an immediate impact on my home value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1818  Respondent: 15455553 / Johanna Simons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A few years ago my parents came to live in West Horsley and I visit as often as I can with my family. Living in the congestion and pollution of London we appreciate the opportunity to spend time in this lovely place in the Green Belt on the edge of the Surrey Hills. Many of our friends try to get out of the City into the peace and quiet of the Surrey countryside as often as they can, in order to escape from the urban sprawl of London.

Maintaining the Green Belt is particularly important for those areas easy to reach outside the M25 and with West Horsley being just outside the orbital ring road it is a great shame if the proposal to build so many new houses in such a small village is allowed to go ahead.

It is surprising that a Council controlled by representatives of the Conservative Party whose policy is to protect both the Metropolitan and Green Belts is planning to destroy land on this precious and sensitive area for no other reason than to build houses on such a scale when it is clearly against the stated policy of the Government.

I know from local people that the concerns regarding lack of a sustainable and sufficient infrastructure will be brought to your attention but as an outsider I want to stress how important the Green Belt is to those of us who appreciate its value as a release valve from the pressures of living in London.

I sincerely hope that the Council will think again about this disproportionate attack on the village and its value to the wider community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3572  Respondent: 15455617 / Maggie Older  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Destruction of green belt in Normandy, Flexford and Wanborough.

It appears that meetings have been going on for a number of years with the developer and the council, but without the knowledge of the people living in these villages. The same developer (then called Taylor Woodrow) developed another green belt site in Normandy some 35 years ago when a development was approved because the developer "donated" six old peoples' bungalows to Normandy Parish.
Please do not allow the destruction of further green belt, when there are brownfield sites which could take one million homes.

**Traffic hazards**

The bridge over the railway in Glaziers Lane is not strong enough or wide enough to support the additional weight of traffic. The bridge is very narrow and there are daily "near-misses" as traffic straddles the white line at speed. There has been a fatality on the crossroads of Glaziers Lane and Guildford Road.

The bridge under the railway in Westwood Lane has a one-lane pass through. There have been fatalities at this bridge.

Wanborough Hill would not be able to cope with traffic from a large development which would affect the traffic flow onto the A31 which already has numerous accidents/delays in rush hours when traffic diverts through Normandy and causes traffic chaos.

**Commercial vehicles**

Large lorries already cause damage in Glaziers Lane when delivering to commercial properties. Should a development be allowed to take place, this lane would be used for all delivery lorries as Westwood Lane has a low-level bridge which could not take such vehicles.

A sink hole has already opened up on two or three occasions close to the junction of Glaziers Lane/Guildford Road.

**Flooding**

Houses in Glaziers Lane experience severe flooding problems. The loss of farmland and woodland and increased paved areas would only increase the seriousness of the flooding. Only yesterday, some gardens in Glaziers Lane became flooded due to rain.

**School**

Two other secondary schools in the area are under-subscribed. I question the need for another school. Also, the traffic from a 1,500 pupil school would cause traffic havoc, such as that experienced every morning rush hour on the Worplesdon Road, Guildford, from the Elizabeth Park housing development.

**Health and safety**

Children would be at risk of serious injury if a site housing fairground equipment was located close to a school. There is presently a large acreage of land in Normandy named "Whittles Drive", Guildford Road, Guildford, which houses a great deal of fairground equipment. There is no need for further storage.

**Destruction of wildlife**

Destruction of hedges/trees and habitats reduces the availability of food, shelter, nesting sites, etc. for our wildlife which are under increasing pressure. A large proportion of Normandy contains part of the Thames Basin Heaths Special Protection Area. We need to protect all sites of special scientific interest. This can never be replaced.

Thank you for taking your time to read this email and please take into consideration all of my comments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/7885</th>
<th>Respondent: 15455649 / Barry Lane</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>I object to these plans.</td>
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<th>Agent:</th>
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<tr>
<td>dear sir i am writing to object to the building of 2000 houses on the wisley airfield. my objections are th following: 1.urban style houses with some 5 storeys high.2.another estimated 4000 cars.3.increase in pollution .4.severe congestion on already congested local and on the A3 and M25.5.environmental damage to an area full of already endangered wildlife.</td>
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<th>Comment ID: PSLPS16/3574</th>
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</table>
Normandy/Flexford cannot cope with the number of proposed houses in the plan. It also does not need a secondary school here. In fact as I understand it, there are still spaces in a lot of the west Guildford secondary schools going spare so would like to see proper evidence of this requirement.

The drainage system and the roads cannot support that many more houses and are already struggling with what it has to cope with now.

On top of this it would ruin the area of natural beauty currently in existence and affect local wildlife (both on the site itself and nearby due to increased volume of walkers / pets) when there are much better brownfield sites that could be used. Or a larger number of smaller developments would also make more sense than such vast ones in tiny villages that do not have capacity to cope with the increases proposed. For example I understand there is a fairly obvious site in West Horsley that would be suitable for a slightly smaller development and Normandy/Flexford could certainly accommodate some new homes (and possibly some retail) but just not nearly as many as are being proposed and certainly no secondary school.

Having recently moved to the area for it's small parish feel and beautiful surroundings, I sincerely hope that you take these comments on board and reconsider your approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to way in which the proposed increase in demand for skilled labour in Guildford makes the plan justify the number of new homes required. The plan does not support these requirements, or at least I could not see the case. There is a lack of Commercial Properties in the area, so where are these jobs going to be created? Also the recent Brexit vote means that the numbers growth need to be scaled back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7904  Respondent: 15455777 / Paul Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that there is little thought shown or given to the already overloaded Horsley village infrastructure-the local school is already at capacity, and trying to get an appointment at the Doctors is already a task in its self. How would these facilities cope with even more homes?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7902  Respondent: 15455777 / Paul Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that you propose that Horsleys be removed from the green belt. I can see no justification for this being made, with no exceptional circumstances being proposed or supported. These villages should not be withdrawn from the Green belt. This would seem to make it easier to build new homes with a broad brush stroke. This is not how development should be conducted in long standing village communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7903  Respondent: 15455777 / Paul Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the number of homes which the plan says need to be built. How can you justify increasing by nearly 35% the number of houses in West Horsley. I agree there is a need for new homes, but this should be done in a sustainable way which is sympathetic to the current villages. So I can agree with the development of “brown field sites” such as Thatchers (A36) and the Bell & Colvill Garage (A37). But the 4 other proposed developments, A38, A39, A40 and A41 should not be granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As a very frequent visitor to see my son, daughter-in-law and grandson who live in West Horsley, I am appalled at the proposals for future housing developments in the West and East Horsley parishes contained in the "Guildford Borough Proposed Submission Local Plan : Strategy and Sites - June 2016".(The Guildford Plan).

The notion that you can increase the number of households by 35% by way of the proposed developments is hard to comprehend particularly when there seems to have been little or no recognition in "The Guildford Plan" of the effect such a huge increase will undoubtedly have on the infrastructure and services.

I think that it is fair to say that the vast majority of people living in the County of Surrey accept that there is a need for more housing, particularly affordable housing but proposals on the scale set out in the Plan are way in excess of what is acceptable and sustainable.

In view of my observations set out above I strongly object to the proposals set out in the "The Guildford Plan" and urge the Council to have a serious rethink about the sizes/numbers of developments proposed and come up with a much more realistic Plan which will meet the aspirations of your electorate living in The Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having expressed my concerns previously I am writing as a concerned parent of a West Horsley resident regarding the latest changes made to the Guildford Borough Proposed Submission Local Plan June 2017 consultation.

My overriding concern is that it would appear that no change is being proposed with regard to the idea of insetting West and East Horsley from the Green Belt thus risking the beautiful countryside of the two Parishes being swallowed up by the Metropolitan Sprawl. The reduction in the number of new homes being proposed for West Horsley is to be welcomed but there appears to be little evidence of a realistic reduction in the overall number of homes being proposed or indeed introducing a fair balance in the number of new homes in the Borough - at present it appears that the Eastern side of the Borough is being targeted with an unfair proportion of new homes compared with the Western side. There also appears to be no proposal to introduce commensurate infrastructure upgrades e.g. medical, educational and transport services to cope with the increased number of residents. The proposed Wisley Airfield redevelopment is a step too far.

It is also puzzling that like a lot of other Borough and District Councils in Surrey the number of new homes proposed in the Guildford Borough Plan well exceeds the numbers required by HM Government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1821  Respondent: 15455969 / Eloisa Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3581  Respondent: 15455969 / Eloisa Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/3585</th>
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I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7926  **Respondent:** 15455969 / Eloisa Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7928  **Respondent:** 15455969 / Eloisa Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7923  **Respondent:** 15455969 / Eloisa Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1168  **Respondent:** 15455969 / Eloisa Latin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
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I would like to register my objections please to the above planning applications.

The impact on Send village of such a disproportionately-sized development would be very negative and would permanently alter the fabric of the village and community. The infrastructure and amenities would not be able to cope with such a development and there is clearly no plan to develop them.

The Garlick's Arch site is in the green belt and so should be off limits to development. Aside from that though, it is in a flood zone and so is in any case unsuitable for development.

I appreciate that houses and industrial units are needed in the area but I would ask that the council prioritises existing brownfield sites before destroying the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7951</th>
<th>Respondent: 15456097 / Sheila Mellstrom</th>
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Finally I object to the threat to our historic villages and their peace and beauty. I hope that, as you rejected planning permission for Wisley unanimously you will now have the three farms Meadows Wisley removed from the local draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to the enormous amount of proposed housing causing huge increases in traffic, problems with finding school places for children in already over subscribed schools, problems for commuters in already over crowded trains, problems parking at the station and shops, pressure on local medical services. All these will ruin the lives of the residents of Ockham, the Horsleys and Effingham.

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<tr>
<th>Comment ID: PSLPP16/7948</th>
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<tr>
<td><strong>I object strongly to GBC Draft Plan which continue to include Wisley Airfield even though planning permission was rejected by you the planners :- for the following reasons</strong></td>
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<tr>
<td>1. I object strongly to any building in the Greenbelt on which we have been promised by the Government that no building will take place</td>
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1. Fifty three years ago my husband and I came to this area for a more rural life and now our children and grandchildren all live here face the awful threat of all being turned into an extension of London by the erosion of the green belt which up to now has protected our lives and homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1822  Respondent: 15456129 / Jean Harding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3587  Respondent: 15456129 / Jean Harding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3588  Respondent: 15456129 / Jean Harding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
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<th>Comment ID: PSLPP16/7939  <strong>Respondent: 15456129 / Jean Harding</strong>  <strong>Agent:</strong></th>
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<td>I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
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<th>Comment ID: PSLPA16/1825  <strong>Respondent: 15456225 / Ralph Bembridge</strong>  <strong>Agent:</strong></th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>
I object very strongly to Guildford Borough Council's Draft Location Plan June 2016.

The situation is becoming 'out of band ' and a stop should be mad e to the unsustainability of the proposals which are flawed in many areas. SH M\^ has indicated there is a housing need of 693 houses per year - why has it been doubled from this figure given only four years ago ? It is not right that GBC should refuse to indicate how the figures have been calculated. The public of Guildford deserve a realistic answer to this question - it is the very least you can do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7955  Respondent: 15456225 / Ralph Bembridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At present it is extremely difficult to drive into Guildford from Burpham - the flow of traffic is just unbelievable. I note it has been indicated that an additional 2,000 homes hope to be built in Burpham. You have to consider that if this crazy plan is passed 2,000 homes could generate at least 4,000, possibly more, cars (2/3 cars per household is the 'norm' these days) so how will we be able to drive into the City centre and exactly where will all these additional cars be parked - if, and when, they arrive in Guildford ? You must be aware that parking in this present day is very difficult - on occasions impossible!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7958  Respondent: 15456225 / Ralph Bembridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have a dreadful feeling that someone, somewhere, is trying their very best to ruin our delightful City of Guildford - a treasure in Surrey. It should be preserved and treasured and not completely ruined by our present team of 'decision makers'.

101 more thought has to be given to the proposals - just 'building houses' is. perhaps, the easy part but it's what repercussions there will be from this final extremely important, decision. More schools, new and better roads to avoid congestion, will certainly be required - the list is end less. The precious "Green Belt' is so important and should be preserved wherever possible - once if s gone it can not be replaced.
I urge you to look at the situation long and hard - your present proposals are simply not acceptable and I feel sure you will have many residents who love Guildford complaining. They should not be overruled and listened to - and take note, of what they say.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3617  Respondent: 15456257 / Hope Holman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Wisley air field being developed with over 2000 new homes. It is too many in a very small village of outstanding natural beauty and green belt. I object to housing as the roads surrounding Ockham are narrow and already have too much traffic cutting through from the A3 & M25 junction 10. I object as there are no secondary schools that could cater for more children than it already does and certainly not hundreds as it could belt is extremely difficult to get into - The Howard of Effingham, the nearest school to the village.

I am a regular visitor to the village where I have grandparents living there, I hope this is stopped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3620  Respondent: 15456321 / Elliot Holman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am a regular visitor to the village where I have grandparents living there, I hope this is stopped.

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<td><strong>This will lead to a loss of Green Belt and therefore make Burpham and surrounding areas a less desirable place to live. There is a lack of evidence for an increased housing development of this scale.</strong></td>
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<td><strong>I object to the 2016 Draft Local Plan to build 2000 homes in Gosden Hill Farm and a further 4000 close to Burpham.</strong></td>
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This will surely lead to much greater traffic congestion, further pressure on local schools and doctors' surgeries with a population increase of this size. What about the negative impact on wildlife and quality of life in general?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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There have already been significant housing developments over recent years that has resulted in the area being a lot more densely populated / congested than ever before that has already resulted in greater pressure on roads, schools and doctors' surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The housing numbers projected by the Council have not been substantiated by the Council, in spite of many requests, so the West Horsley Parish have carried out their own survey, that clearly suggests the figures to be wrong. The Green Belt must be retained as it stands today and each Planning Proposal should be judged on it's own merits. I voted Conservative when they came to office and they vowed to preserve the Green Belt, therefore I expect them to stand by that promise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7959  Respondent: 15456385 / Steven Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Not only that, the infrastructure simply does not exist, certainly not in the Guildford Borough where roads are already inadequate, hospitals and doctors surgeries are not coping, transport systems are under severe pressure as are the schools. The plan makes no provision for putting this right, just feeble remarks suggesting each development will have to look into available possibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7960  Respondent: 15456385 / Steven Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with regard to the above plan and wish to express my strongest possible objections, not only to our own Parish proposals, but to the principle applied to the whole Borough. I totally understand that "development" in terms of housing and commercial has to happen, but not on this scale and not at the expense of our vitally important "Green Land". This has to be preserved for future generations and even for the health and wellbeing of the generation of today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3645  Respondent: 15456481 / Doreen Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I further object to the development of over 2000 houses at Wisley Airfield as this will have a massive impact on the already stretched resources in the surrounding areas of Ripley, East and West Horsley, Effingham, Cobham and Ockham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am against the overall building proposals that will encroach upon land in the Horsley area.

I object to any proposal that intrudes on the Green Belt area. There is no special circumstances that prevail to even consider this. As you are aware, that land taken for this project will then be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7964   Respondent: 15456481 / Doreen Harris   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I recognise the need for a small number of dwellings to be erected in the area but the proposals outline in the Local Plan are outrageous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4535   Respondent: 15456545 / Paul and Lynn Cozens   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We also feel that major plans like this should be put on hold. At present population numbers are uncertain. Until the UKs exit of the EU proceeds further we can now not possibly accurately predict population numbers and housing need. This quantity of extra houses may well not be needed and calculations to prove this housing need must be published.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7966  Respondent: 15456545 / Paul and Lynn Cozens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to object to the proposed local plan. The greenbelt was created to prevent urban sprawl and overdevelopment. Proposed greenbelt destruction confirms the point of overdevelopment has been reached and should not be permitted. Respect why greenbelt was created in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3658  Respondent: 15456577 / Jane Cochran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The inclusion of 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I doubt that any of these homes will be truly affordable to local residents like myself and will lead to a further influx from surrounding areas and thus not meet the requirements of the local population.

- I object to the disproportionate allocation of housing in this particular part of the borough. 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC.

- I object to the threat the Local Plan poses to the historic rural village of Ockham. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. This will cause an increased volume of car traffic on roads which are already congested.

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas will have a significant impact on the quality of life for existing and future residents.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I am writing with the aim of recording my objection to the Guildford Local Plan 2016. I understand that part of the plan includes the removal of Green Belt protection from a number of villages in the Guildford area. The Green Belt status was put in place for a reason. Removal of Green Belt status to allow for housing development is unacceptable and unjustifiable. While I understand the necessity for more housing, I believe this could be fulfilled using housing that is currently derelict/vacant and by using brown field sites. Such sites are not as attractive to developers, however if they wish to profit from housing development they should be forced to use such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

• I object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
• No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
• There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• I object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
• The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
• I object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
• I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
• The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
• Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is not plausible. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
• There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
• I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1828  Respondent: 15456673 / Suzy Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Local Plan. I live in West Horsley where the pressure on our locals schools, Doctors and other such amenities is huge. We do not have the infrastructure to support these plans.

Please note my objection to this plan on these grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3703  Respondent: 15456705 / M Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I WOULD LIKE TO ADD MY OBJECTION TO THE PROPOSED A46 DEVELOPMENT IN NORMANDY AND FLEXFORD.

As a long term resident of the part of Ash which comes under the boundaries of Normandy Parish, I have attended the public meetings and have read the literature published and I strongly believe that Guildford Borough Council should not allow the development to go ahead due to a number of reasons.

GREEN BELT LAND

The proposed development being an inappropriate use of a rural area. This land is designated as Green Belt land, the fundamental aim of Green Belt Policy being to prevent the unrestricted urban sprawl by keeping land 'permanently' open. It is part of the essential and important divide between Guildford and Rushmoor Boroughs, and the ever enlarging Guildford and Aldershot urbanisation and their respective areas. Developments on green fields not only add to creeping suburbanisation but once change of use has taken place, the decision can never be reversed and that particular part of the rural environment is destroyed and lost forever. I question why more attention cannot be paid to the development or brownbelt or brown field sites, which in some cases have some or all of the services in place and so in the long term could be less expensive to develop. Local Authorities are required to have a register of brownfield land so sites that can be recycled, regenerated and put back into use. Places on the Guildford list include Woodbridge Meadows, Walnut Tree Close by the station area and North Street, however I do feel if further research were carried out appropriate further development sites could be found with less of a need to take virgin Green Belt Land. Also why cannot better utilisation be made of unused sites within the urbanised areas of Guildford itself and its surrounding areas particularly when apparently there is a desperate requirement for housing in central Guildford itself? Why is there a need to locate new properties on the edge of the Borough and how can the Council justify releasing precious Green Belt Land to be lost forever?

NATURAL FLOOD PLAINS.

I have owned my property for over forty years and over that time have become fully aware of the importance of maintaining the natural flood plains due to excessive rainfall during particular years and in particular areas. From what I have learned I feel that Guildford Borough Council have not completely considered the implications of water stress upon this Green Land. Their Surface Water Management Plan has excluded the land north of A46, yet flood risk 3a and 3b is identified on the Environmental Agencies flood risk map. Loss of, or the development on, of an effective flood plain would severely impact on the surrounding areas, putting not only any newly developed properties at risk, but more importantly and most unfairly, existing properties. Time and again I have personally witnessed the results of heavy rainfall on land down between the higher ground of the Hogs Back and the adjacent army land and one feature is highlighted. The current land for floodplain and the drainage services find it hard to cope in containing and draining away the water. New mass development of the land will surely only add to this problem.

PROPOSED AMOUNT OF BUILDING

I find the number and type of properties proposed to be built in the village of Normandy to be disproportionate and in certain cases unjustified. I am well aware that the Government sets quotas and guidelines for our Councils to follow, however the impact of 1100 houses on a village such as Normandy has the possibility of totally changing the place, socially, environmentally and economically. More concerning than the development of habitations are the proposed plans for a school. I learn that apparently Secondary schools to the West of the Borough are currently undersubscribed by a significant number so question why a school should be needed. The reason given is that educational provision planned is because of the need arising from the allocation of development on this site, so the argument again turns to that if the development were not taking place then the school would not be needed. On a similar vein there is also the proposed parade of shops on the new development. Due to the nature of how residents access and use local amenities, shops and pubs have had to close in the recent years because they became no longer economically viable. Again then I question why are decisions regarding services for the public being taken without consultation with the local population to find out the actual realistic need for the area?
ROADS AND TRAFFIC

I do strongly believe that the Green Belt is already being eroded by disproportionate ‘strategic sites’ particularly as they do not always have the secured funding for infrastructure and road improvements. Normandy is a predominantly rural area and the transportation of residents accessing shops and amenities in the local areas is in the majority of cases by private vehicles. The level of traffic on the local roads in and around Normandy is already well above the capacity these roads were designed for, the main road through the village being an ‘A’ road and main artery between Guildford and Aldershot. The situation at the moment though is that this road is only single carriage either way and thus any minor incidents such as horse riders, vehicles parked on the side of the road, delivery vehicles, the beginning and end of the school day, etc., already have the capacity to bring traffic to a complete stand still during certain times of busy flow. There does appear to be no evidence of secure funding for any major improvements to the roads passing through or around Normandy. The not unjustifiably expected and drastic increase of motor vehicles introduced from such a comparatively small area onto the existing network then will only add to the causation of grid-lock, stagnation of the local economy and massively increased exhaust pollution.

Having lake” into consideration the above factors. I cannot conceivably see how the proposed plans can be legally compliant with planning policies set for local authority areas. Not only do they not fully meet the legal requirements of the relevant Planning Acts and Regulations, but their implementation could bring long term and lasting, severe and detrimental effects to the area, affecting it environmentally, socially and economically.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/532  Respondent: 15456705 / M Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to add my support with regard to the removal of the site A46 (1,100 homes and school on land to the south of Normandy and north of Flexford), and site A47 (50 homes on the land to the east of the Paddocks, Flexford). I feel that the infrastructure, particularly the road network, would not be able to cope with the addition of such large developments. Living on the Guildford Road I already witness first hand the current congestion created at particular times of the day, along with that due to the railway crossing at Ash and have concerns over the current quotas of new housing being built in the immediate surrounding areas on the road network between Aldershot and Guildford. Surely other solutions should be looked at further and seriously when it comes to the council meeting its needs for the development of new housing, including the re-use of already developed land, infill on undeveloped parcels of land within urbanised areas, or Brown land sites. New building should definitely not be taking place on Green Belt land.

I would also like to object to the removal of homes in the areas of the Guildford Road, the northern end of Glaziers Lane, Flexford, the Waldon Cottages and the Palm House Nurseries traveller site. As I have been informed, placing these sites outside of the Green Belt could in theory enable development and give a much greater success for future planning applications. This I am most opposed to as it too as it gives potential to encroach on an ever threatened and decreasing Green Belt, an important natural divide between the urbanisation of Aldershot, Hampshire and Guildford, Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The inclusion of 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I doubt that any of these homes will be truly affordable to local residents and will lead to a further influx from surrounding areas and thus not meet the requirements of the local population.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. At present cyclists are already endangered by the number and speed of cars passing through the area and this will do nothing to improve the situation.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads which are already congested. At present the roads are in a terrible state with numerous pot holes and the council seems to do little to maintain them.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. In addition the council seems to show no support for measures to reduce traffic on the roads such as the provision of school buses which were once in place but have now been terminated.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the lack of immediate provision for new schools.
8) I object to the lack of immediate provision for Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1833  Respondent: 15457441 / Margaret Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7975  Respondent: 15457441 / Margaret Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9) I object to Increased traffic on already badly surfaced road and small lane so congestion.
10) I object since our villages have limited parking
11) I object to severe pollution in areas already severely affected

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7977  Respondent: 15457441 / Margaret Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan for Horsley, Ripley, Send and Clandon

Our villages are based on agricultural environment in the green belt and what you are suggesting with the plans opens up building program that will totally destroy our villages, way of life and the green belt for ever. In the past development has been gradual and infra structure has been planned. There are places in Surrey/Sussex and I am sure all over the country where massive building has occurred and totally changed the area unrecognisably.

1. I object to all erosion of green belt.
2. I object to any "in-setting"/removal of any villages from green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7976  Respondent: 15457441 / Margaret Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once our green belt is gone its gone for good and England will no longer be a green and pleasant land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
12) I object to increased risk of flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7974  Respondent: 15457441 / Margaret Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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3) I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1169  Respondent: 15457441 / Margaret Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4) I object to the limited consultation period.

5) I object to the last minute inclusion of new sites with less than two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/271  Respondent: 15457441 / Margaret Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
You are ignoring all our objections. We do not wish our village lives to change. The infrastructure is not capable.

Building on this type of scale puts pressure on facilities, schools, medical centers which are all overstretched. Where money is involved, it is persuasive and services are shimped. In the past development has been gradual and on the whole well planned. Now everyone is getting on the bandwagon on infilling and developing any part of the greenbelt the council will allow, stop changing our lives and our area.

Traffic, already difficult, well increase dramatically especially where tannery lane meets the A247 junction. Which is highly restrictive. Our local roads are not designed for the increase in traffic for both the building part and then the residents once finished.

What the building of these properties in Tannery lane, Garlick Arch, Burnt Common, Wisley is proposing is the destruction of our village, our sacred greenbelt.

With the ancient woodland and our current way of life. Traffic will be increased to such an extent to be problematic. The effect of building on the flood zone always avoided will now effect local residents and its the everyday people who will suffer. By infilling in this way, the occupant will need to travel; out to work, increasing gridlock. Most houses have at least two cars per household and the majority have 4.

There is no circumstances that can warrant the destruction of our green belt and once its gone its gone, please take our objections seriously.

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3713  Respondent: 15457505 / Julie Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal.

This rural country lane, Tannery Lane, has already had permission granted for the building of a marina and 64 apartments. These will cause a huge increase in traffic using this very narrow lane and also an increase in the traffic exiting the lane onto Send Road (A247).

Send Road is already extremely busy and frequently at a standstill because of the amount of traffic travelling between the A3, Woking, Guildford and other villages in the borough. Residents living along Send Road are either inhaling traffic fumes because of the traffic jams or in danger trying to cross this busy road. On many occasions Send residents have requested traffic calming measures and a pedestrian crossing but have only been given 3 traffic islands which are constantly being damaged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3710  Respondent: 15457505 / Julie Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick’s Arch has previously been protected from development as Green Belt. There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There was no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).
This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3). The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1) Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3714  Respondent: 15457505 / Julie Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposal.

How could this proposal have been such a last minute thought? It is such a large development I have no confidence that the implications of it have been thought through. If it is not a last minute thought then why have we not been informed of it before? It is highly suspicious, surely it cannot be legal to deprive us of a full length consultation period?

This plot of land creates an important buffer between Send Marsh and the A3 and also prevents the village of Send merging with Clandon

What are the special circumstances that would allow 400 houses to be built on this flood prone, Green Belt with ancient woodland, when the housing numbers that we have been told we need are highly questionable?

Why do we need 700 sq metres of more industrial space when GBC has failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013.

This proposal would be right next to the A3. So again air quality for those living in the 400 houses should be questioned. Building sound proofing bunds does not protect the inhabitants from air pollution.

The high density housing and industry would also add to the already congested A3, M25 and A247. In addition to developments proposed at Wisley and Gosden Hill Farm. It would also create a huge burden on our other facilities e.g. schools and medical centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3711  Respondent: 15457505 / Julie Gray  Agent:
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km
Furthermore this land is held in trust with Manorial rights and has no business being included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This again is a hugely important development which has suddenly appeared in the Local Plan.

If traffic is allowed to access the A3 northbound and exit it southbound it is likely to more than double the amount of traffic using Send Road. This is without taking into account the traffic generated by the development of Wisley and Gosden Hill.

There seems to be either a lack of understanding of the consequences of these sorts of developments and/or a total lack of consideration for those of us who will suffer.

I object to this proposal.

It seems grossly unfair that Send has been targeted with so many unsuitable proposals which will fundamentally change the whole nature of our village. Some of the proposals have been included at a very late stage, as some sort of afterthought, without allowing a decent consultation period. It seems most unprofessional and I do question the reasoning behind it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this proposal.

I know this area well as it is one of the few pieces of open ground available to dog walkers now that the old sandpits and the field alongside have been fenced off. Surely this is not suitable land to build houses on as it is a landfill site. I remember that all sorts of rubbish was dumped on this site including asbestos. There seemed very little control on the rubbish dumped here. Lorries just used to turn up and dump their load including lots of smaller vehicles. Surely if houses are built here there will be health issues for the people who buy the houses or park their caravans?

Again Send Hill is very narrow and a single track at the Potters Lane end. Any additional houses will inevitably result in more cars using it causing more problems outside our houses at busy times. And again the proposal will exacerbate the congestion on Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2) Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites. There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7987  Respondent: 15457505 / Julie Gray  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5) Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7993  Respondent: 15457505 / Julie Gray  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7994  Respondent: 15457505 / Julie Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes
I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7989  Respondent: 15457505 / Julie Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7991  Respondent: 15457505 / Julie Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7992  Respondent: 15457505 / Julie Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7979  Respondent: 15457505 / Julie Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

64.9% of all proposed sites in the plan are on Green Belt land – some 8000 houses, This is NOT acceptable and is certainly not GBC’s position to give this protection away. The Green Belt was setup to protect our open spaces from the very thing the GBC are planning. We all have a duty of care to up hold the Act and ensure that the GREEN BELT IS NOT ERODED - ONCE ITS GONE, ITS GONE FOREVER.

There are NO exceptional circumstances to enable this prosperous plan and it sets a dreadful precedent for conservation and represents a threat to the public health, wellbeing and quality of life of not only local residents but wider urban areas and future generations.

Our Green Belt Policy is set in law and is a living example of sustainability and is the envy if the world. Apart from all the regularly mentioned reasons for not building on Green Belt (stopping urban sprawl, protecting openness and space around development), it also poses a devastating threat on our ecosystems, our biodiversity, our nature and wildlife species at a time when many of our resident and migratory species are in drastic decline nationwide.

GBC has taken perfectly good brown field sites out of the plan (A43 – 2014 Plan) and replaced them with Green Field sites - there is NO rational for this other than being manipulated by developers and the promise of money to enable bigger sites to be accepted.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighboring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch A43, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7985  Respondent: 15457505 / Julie Gray  Agent:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Notwithstanding that NO one has seen the SHMA figures and how they were calculated, it’s hard to take the figures in the plan seriously and one wonders how the plan has got this far without the transparency required. It’s apparent they are over inflated and no constraints have been applied.

Its seems GBC are going for gold in being able to accommodate large numbers of houses that are simply not needed or substantiated.

There are fundamental differences between the 2014 and 2016 plans namely the movement from planning in urban areas to rural ones - and the creation of an Urban Urban areas ( whatever that is)?? It is apparent the GBC is moving its boundaries around to suit the sites suitable for large developments which is not in line with the governments new ruling to ensure SMES are able to partake in building the future housing needs.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

I agree more houses are needed - but these need to be strategically panned - using brown field sites unless there are exceptional circumstances, in sustainable areas - in SURREY 80% of that needs to be Urban as developments in the villages are not sustainable and neither is it possible on already very congested roads to accommodate more traffic.

Surrey does not need more executive homes - what it desperately needs is affordable homes - this can only be achieved by building flats and studio flats - more properties on less land - we could have Iconic 6/10 floor flats along York Road, which is close to the Station and would be much more affordable and as importantly sustainable too.

The plan is fundamentally flawed as 50% of the developments proposed are along the A3 corridor in huge estates - 3 of them with more than 2000 homes - this gets GBC the numbers - but it does not tally with the lack of infrastructure, which is not satisfactorily tackled in the poor infrastructure plan. 3000 of the houses needed are for Students of the university - The University has 17 hectares of car park space and this land could be used to build sustainable student accommodation with parking beneath - this is simple common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>SQLP16/1170</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I feel that common sense has not prevailed in this plan. A fortune has been spent on expensive consultants - yet the plan is aspirational, muddled and uses the Green Belt as a rule not an exception. The answers to plan are already in front of us, yet ignored. Use all the brown field sites (and there are more than enough) support SMES as our government dictates and build lots of smaller developments, which lessens traffic burden and spreads the housing load across the borough (not 50% within a 5 mile radius), make the University provide its own accommodation on its land and consult with the community in bite size chunks – not with an overwhelming document that is too difficult for people to understand. Make the plan fair, just and reasonable so that the communities are not being compromised and our green belt is not being eroded.

Instead plan for houses that are needed, gradually, in the right areas with a considered and reasoned approach – joined up thinking is lacking in the rush to produce an aspirational plan that frankly impresses no one, in fact the money wasted on this is beyond comprehension.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavor in order to protect the Green Belt.

Therefore WHY is this Revised Local Plan Unsound?

The Plan will not deliver sustainable development in accordance with the policies of the Framework. Rather it will lead to serious degradation of the rural environment, erosion and piecemeal development of vital Green Belt land, harm to heritage assets, intensification of use and urbanisation and access to new development principally by motor car, leading to congestion or upgrading of rural roads at the expense of rural character. The effect on existing and future residential communities will be diminution in social cohesion, reduced quality of life and substantial harm to the amenity. The overall housing land requirement in Policy S2 and the Proposed Delivery of housing in Table 1 of the Plan, as well as individual allocations in the Plan considered above, are not founded on a robust and credible evidence base. The planned 30% oversupply of housing sites will make monitoring impossible and will lead to a de facto housing requirement which significantly exceeds the OAN. Furthermore vital evidence is missing in parts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A50 Whittles Drive, Normandy
Normandy Travelling Showpeople plots 14

A51 Land at Cobbetts Close, Worplesdon
Worplesdon Traveller pitches (sui generis) 20

A52 Four Acre Stables, Aldershot Road, Worplesdon
Worplesdon Traveller pitches (sui generis) 6

A53 Roundoak, White Hart Lane, Wood Street Village
Worplesdon Traveller pitches (sui generis) 1

A54 Lakeview, Lakeside Road, Ash Vale
Ash Vale Traveller pitches (sui generis) 4

A55 The Orchard, Puttenham Heath Road, Puttenham
The Pilgrims Traveller pitches (sui generis) 2

A56 Valley Park Equestrian, East Shalford Lane, Shalford
Shalford Traveller pitches (sui generis) 5

A57 The Paddocks, Rose Lane, Ripley
Lovelace Traveller pitches (sui generis) 4

However, we do have some concerns about the implementation of the proposals and the impact it could potentially have on existing Gypsies and Travellers who live on these sites where comprehensive redevelopment/ intensification / redesign is proposed.

Whilst additional pitches and improvements to site facilities are welcomed, it is an imperative that existing occupiers are fully consulted on any proposals and their views taken into account prior to any commencement of works. Without knowing the full details of the proposals, or the exact nature of the sites, it would appear that some of these could not be implemented without existing occupiers being willing to relocate within a site, if only for a temporary period.

We would strongly advise that the Council engage with everyone who may already live on these sites prior to progressing any of these proposals further. Engagement should be fit for purpose, and include face to face meetings in order that the wishes of existing on site Gypsies and Travellers can be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7978</th>
<th>Respondent: 15457537 / Surrey Gypsy Traveller Communities Forum (Ann Wilson)</th>
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<td>Agent:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Proposed Submission Local Plan: strategy and sites 2016

Thank you for giving the Surrey Gypsy Traveller Communities Forum (SGTCF) the opportunity to comment on the above Plan. Mrs. Hilda Brazil, the joint Chair of the Forum, has already taken the opportunity to address Councillors at the EAB Committee held on 13th April 2016, about the pressing need to meet the accommodation requirements for Gypsies and Travellers within the Borough. We hope that this has helped to increase awareness of our needs and the way in which provision for Gypsies and Travellers in the past has been wholly inadequate.

We very much hope that this Local Plan offers a turning point and that our needs are satisfied in the future. The SGTCF welcomes the Council’s commitment to meet the accommodation needs of Gypsies and Travellers, and we are willing to assist in any way we can in order to increase participation and awareness of planning issues within the Gypsy and Traveller Community.

The SGTCF would like to submit the following comments in response to your proposed submission local plan.

STRATEGY

Policy H1: Homes for all

The SGTCF support the commitment of the Council to identify sufficient sites for Travellers' accommodation needs as set out in the latest Traveller Accommodation Assessment. We welcome the fact that these sites will be for a mix of tenures and provided on a number of small sites.

We also support the Council’s commitment for all new sites to have adequate utility services and amenity space, space for related business activities where appropriate, safe vehicular access, turning space and parking and that these sites should be in areas with reasonable access to schools, health services and local services.

Providing Traveller accommodation on development sites of 500 homes or more will help in the provision of land to meet needs. However, the location of accommodation within these larger development sites should be treated sensitively and considered in full consultation with the local Gypsy and Traveller community.

Should any of these larger development sites not go ahead, the plan should include contingency measures in order that the needs of Gypsies and Travellers can still be met in other ways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7981  Respondent: 15457537 / Surrey Gypsy Traveller Communities Forum (Ann Wilson)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
POLICY H3: Rural exception homes

The SGTCF supports the inclusion of pitches for Gypsies and Travellers within this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7997  Respondent: 15457665 / Robert Grant Martindale  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection to the Guildford Local Plan 2016, in particular the removal of Green Belt protection from villages surrounding Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1839  Respondent: 15457729 / Graham Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re My Objections to the new Guildford Local Plan are as follows;

-I do not believe the Council have demonstrated that ‘exceptional circumstances’ exist to justify ‘The Horsleys’ being removed from the Green Belt.

-I am not aware of any plans to materially improve the infrastructure re drainage, medical facilities etc to take account of the proposed increase in population.

-No sound reasons have been given for the proposed extension of the boundaries of the settlement areas of the Horsleys.
The excessive number of new houses (593 new houses in the Horsleys within 5 Years of adopting the plan) proposed arising from a Strategic Housing Market Assessment (SHWA) that was generated by a consultant’s mathematical model, which is not revealed in the plan, nor apparently to Guildford Borough Council (GBC). I think this raises major doubts concerning the inflated number of new houses proposed by the SHWA and further increased by GBC.

I hope the Council will take my concerns into account during this consultation period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1842</th>
<th>Respondent:</th>
<th>15457793 / Jonathan Lord</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I have been a Send resident all my life. The village has seen development but nothing on the scale that has been proposed in this 2016 Local Plan. It really has alarmed my family and all our community, at the proposed developments around our home.

I strongly object to Send village being removed from the Green Belt. This acts as a buffer between Woking and Guildford, because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. We are so close to being absorbed into the urban landscape.

I voted for the Conservative party at the last election and one of the main reasons was because of the promise to protect the Green Belt. I do hope the Conservative party/GBC do not break this promise.

I object to the Garlick’s Arch site with the change of this land, as it is ancient woodland, of local beauty and floods. I object to the 400 houses and the 600+ cars. The local roads are already heavily congested at commuting times let alone with more added, and also the pressure on local facilities.

I object to the 7000sq metres of industrial units at the Garlick's Arch site. Is there not space yet at Slyfield or Brownfield sites that are more appropriate for industrial units rather than virgin Green Belt land? Also I believe from the last Employment Land needs Assessment of 2015 that this showed a reduction of 80% in required employment from the previous Local Draft Plan.

I strongly object to a new interchange with the A3 at Burnt Common. Send will be a cut through and have to take the extra traffic from Woking and Guildford and also the A3 and M25 for the proposed developments at Blackwell Farm, Gosden Hill, Wisley Airfield, and Burpham. Our main road, the A247 is already struggling, with regular crawling traffic/gridlock. The pollution and noise levels are already very high.

I strongly object to the development of 40 houses and 2 travellers pitches at Send Hill because some the lane is single access and some parts winding and extremely narrow, to add even more traffic to an already struggling road would be dangerous. I have been gridlocked many times with traffic unable to pass along Send Hill and then blocking Potters Lane. It cannot be walked safely as a pedestrian. Also I believe, the land is an unsafe landfill site. It's a beautiful area of countryside that I walk and enjoy on a regular basis. Also this affects our local cemetery that is a place of beauty and peace; this will be compromised.
I strongly object to the Clockbarn Nursery site with 45 houses because again of the very inadequate access and traffic volume. Tannery Lane is like many of our Send back lanes, very narrow and twisting. It is already very hazardous for traffic from Tannery Lane to join the Send Road. Traffic has to dangerously edge out, and often gridlocks Send Road. We already have the marina development going ahead and 60+ apartments, and I feel that this in it's own right will cause enough traffic concerns. Also at this junction is our Send Recreation Ground, which has been highly maintained and extremely popular. I object to any more pressure being put on this road junction as it will be a detriment to our Park, with safety, noise and pollution.

I have also read and heard about the GBC's refusal to disclose their housing requirement calculations and that these have been greatly exaggerated. I object to having local plans being suggested without the GBC written evidence to back up the housing requirement. I object to the fact that infrastructure requirements have not been properly thought through, as Send's are not good enough to deal with the proposed housing levels. There will be irrevocable pressure and damage on the surrounding flora/fauna and infrastructure; roads, doctors, schools will not be able to handle this.

I do appreciate that housing in the Guildford borough is needed but would ask that GBC put every effort looking into Brownfield sites in the urban area before the open countryside.

I would like my comments to be shown to the Planning Inspector and also a confirmation that you have received my communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3687  Respondent: 15457793 / Jonathan Lord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Send my whole life and I enjoy the mix of housing and environment. I walk often in the surrounding area and it would be such a shame to lose the countryside appeal of Send. I object to the removal of Send from the green belt because the countryside gives a needed buffer between our local towns. I object to any proposal to build on the green belt land, as I believe you should use all the urban/brownfield sites in Guildford (nearer transport links) before using any green belt land.

I object to the Garlick’s Arch site with the change of this land as it is ancient woodland, of local beauty and floods. I object to the 400 houses and the 600+ cars. The local roads, especially the A247, are already congested at commuting times, and also the pressure on the local infrastructure. I object to the 7000sqm of industrial units at the Garlick's Arch site. I believe you should use all the urban/brownfield sites that are more appropriate for industrial units rather than greenbelt land.

I object to a new interchange with the A3 at Burnt Common as Send will have extra traffic from the A3 and M25 for the proposed developments at Blackwell Farm, Gosden Hill, Wisley Airfield, and Burpham Woking and Guildford also. Send will become a cut through. Our main road, the A247 is already struggling, with regular crawling traffic/gridlock. The pollution and noise levels are already very high.

I object to the development of 40 houses and 2 travellers pitches at Send Hill because some the lane is single access and some parts winding and extremely narrow, to add even more traffic to an already struggling road would be dangerous. It cannot be walked safely as a pedestrian. Also I believe, the land is an unsafe landfill site.
I strongly object to the Clockbarn Nursery site with 45 houses because of the very inadequate access and congestion. Tannery Lane is very narrow and twisting. It is already very hazardous for traffic from Tannery Lane to join the Send Road. Vehicles have to edge out. The planning has gone through for the marina development with 60+ apartments, and I feel that this will cause enough traffic concerns.

Although I realise that housing in the Guildford borough is needed I would ask that GBC put every effort into looking into Brownfield sites in the urban area before using the green belt/countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1859  Respondent: 15457953 / Ian Symes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A39, A38, A40, A41

East Horsley, West Horsley:

I object to the over-development of East and West Horsley. These four proposed site selections will add approximately 445 housing units in what is presently green belt. This as over-development of these two neighbouring villages, with land being inset from the green belt for the sole purpose of meeting housing targets and a further urbanisation of the green belt between Leatherhead and Guildford. Site selections A39, A40, and A41 seem to have no logic, they do not follow easily identifiable boundaries and seems to be created for the sole purpose of artificially creating sites for development in the green belt. Sites 39 and 41 seem only to have development on one or two sides and are in open green belt and inappropriate for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3736  Respondent: 15457953 / Ian Symes  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Wisley:

I object to the Wisley site selection and approximately 2000 units proposed for the former Wisley Airfield. It is an over-development of the site and an over-development of the local area which will adversely affect already heavily congested local roads and puts strains on public transport infrastructure and local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>15457953 / Ian Symes</th>
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H2:

Affordable Homes:

The 40% affordable housing target is far too high a figure for building outside urban areas. This should be set at a more practical 30%. If it were set at this lower level, there would be more room to reduce the overall housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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Please find my response to Guildford borough Proposed Submission Local Plan: strategy and sites (LP). I live on the border between Effingham and East Horsley and will be focusing my comments on these two villages and neighbouring West Horsley and Ockham.

I welcome the new plan and the urgency that GBC are showing to get a Local Plan (LP) in place. The LP contains many thoughtful and acceptable policies covering affordable housing, protection of our green assets, local jobs, infrastructure and design of new builds.

However, I am very disappointed with the severe erosion of the green belt that is being proposed. The LP proposes taking far too much land out of the green belt to meet housing targets. It artificially engineers some inset boundaries for the sole purpose of creating new sites for building in the green belt. Some of the inset boundaries are artificially engineered to such an extent that the boundaries are unclear and do not follow easily identifiable or permanent borders, site selection 41 is an example. The LP also proposes the over development of villages such as Ockham and East and West Horsley by excessive building on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2
Green Belt:
I object to the insetting of Effingham, East Horsley, and West Horsley. The NPPF Para 86 states that “If it is necessary to prevent development in a village primarily because of the important contribution it makes to the openness of the Green Belt the village should be included in the Green Belt”. These three villages should all remain washed-over by the green belt as they all make important contributions to the openness and attractiveness of the green belt. In addition, they make an important contribution to maintaining the remaining green belt between Leatherhead and Guildford. These villages play an essential in preventing the erosion of the green belt in this area and should continue to be washed over by the green belt and not inset. I am also concerned that insetting is being used to create green belt areas specially for the purpose of housing development, to meet housing targets. For example, the inset boundary at Site Selections 39, 40 and 41, look artificial, taking inexplicable turns, following unclear boundaries for the specific purpose of artificially creating a development plot. This is completely contrary to NPPF paragraphs 86 and 87.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

P5

Thames Basin Heaths SPA:

I object to a car park on Effingham Common. Its proposed location in the middle of the common is in an area where Skylarks nest, and Skylarks are on the red list in the UK. A car park situated on the Common is completely impractical, it would be full of commuters’ cars from morning to night as it is so close to Effingham Junction station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8006   Respondent: 15457953 / Ian Symes   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the following policies:

Policy Number: S2

Policy Name: Borough Wide Strategy

Explanation: I object to the very high housing target. Over 80% of Guildford borough land is situated in the green belt and the LP sets a housing target figure which is too high for an area such as Guildford borough that is predominantly green belt – and green belt for the reasons that it stops the spread of London, provides clean air protection to the city and is a place where city dwellers and others can enjoy the countryside within an easy distance of their homes. The continual erosion of the green belt over the last 60 years seems to be accelerating with the LP proposals for swathes of land to be pulled out of the green belt for housing development in contradiction to NPPF 87. This requires very special circumstances for development in the green belt and, as Government ministers have stated on many occasions, the need to meet housing targets is not a very special circumstance. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints, based on the high proportion of green belt in the borough. The housing target is also being driven higher because of:

1. Over ambitious economic growth targets, 125 new builds per year are due to economic growth. In present circumstances a less ambitious growth target would seem more appropriate.

2. Future reductions in student numbers at the University of Surrey. Student numbers from Europe are set to reduce as they will shortly have to pay full fees.
3. The 14% housing buffer is forcing GBC to identify site selections in the green belt that would not needed if there were no buffer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp173/32</th>
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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Sang 1 Page 325 Effingham Common**

Remaining maintenance and management costs of £8,969 plus interest funded by developer?

What exactly is funded and what does this mean for Effingham Common? There is no explanation of this statement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Maps, Appendix H, Page 12, Effingham**

Would you kindly review the inset boundary proposal to the east of Effingham village. The proposed inset boundary to the east of the village is still unclear. I suggest the boundary comes up Browns Lane and Church Street until it reaches footpath FP118. This footpath, which goes to the north of the St Lawrence Church and to the south of the Howard of Effingham School joins up with the rest of the Submission LP proposed inset boundary at the north west of the KGV fields.

This follows a much more clearly defined and permanent boundary – based on roads and footpath FP118. If this changed boundary were applied it would be clear and defensible over the plan period and avoid confusion in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Paragraph 2.10a

This new (moved) paragraph understates the pressures on the local road networks in the villages. Many rural roads are too narrow especially in Effingham and the Horsleys to take continuous flows of development traffic and the increased traffic from the proposed new developments at Wisley. Rural roads are often so narrow that two cars must slow to pass and two lorries often cannot pass each other without going on pavements. This is a serious road safety issue and this point should be made in this paragraph. It means that developers must take the widths of local roads into account in their planning applications and seek to mitigate road safety matters. Infrastructure deficiencies need to be addressed by Surrey County Council or the developer before development work starts, especially where the rural road network is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

3.1 Wisley

The Green Belt inset should not be expanded at Wisley there is no justification for this. It would be better to reduce the inset to make more defensible boundaries. This would also have the advantage of reducing the over-development of Ockham as described in Guildford Borough Council’s Wisley Appeal Statement of Case where GBC describes the Wisley development as a totally disproportionate attempted location of 2068 dwellings within the ancient village of Ockham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3737  Respondent: 15457985 / Julie Barratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**GBC Draft Local Plan re Normandy & Frexford Site A46**

This is to register my very strong **OBJECTION** to the building plans for the Normandy and Flexford site A46

For the following reasons:-

1. **THE SCHOOL.**

I object most strongly to the proposal to build a secondary school. By no stretch of the imagination is this school necessary. There is proven spare capacity in other local schools and the opportunity to expand some of them if necessary. The proposal to build this school is clearly the developers ‘carrot’ to enable them to get permission for the rest of the plan.

1. **TRAFFIC.**

I object to the fact that no thought seems to have been given to the chaos the additional traffic would cause. The whole area would be in total gridlock morning and afternoon. It can take the best part of an hour now, to travel the few miles into Guildford in the morning. There is clearly no way in which these country roads could be improved to accommodate the extra traffic in and out of the village.

1. **GREEN BELT.**

This is Green Belt land and should remain so. There would be no reason to sacrifice it if ‘brown field’ sites in Guildford were used for homes instead of endless new retail outlets. If more consideration was given to building accommodation in Guildford it would avoid the congestion and pollution caused by countless car journeys into the town.

1. **NEED.**

It is not a proven fact that we need this many new homes in the Guildford area.

How was this figure arrived at?

1. a) Part of the suggested need is due to student requirements. If accommodation was built on campus the students at the University would not have to travel from elsewhere.

2. b) Most of the villages around Guildford could accommodate a realistic building plan off up to a total of 10% increase over the time of the plan. This would be accomplished without ruining any of the villages.

1. **WILDLIFE.**

I object to the fact that no attention is being paid to the various government directives regarding the effect a building plan will have on the local wildlife. One of the considerations is the close proximity to the Thames Basin Heaths Special Protection Area. These appear to be being completely ignored. This size of the proposed development would have a huge impact.

1. **LEGALITY.**

There is a question of the legal aspect of the whole plan. There doesn’t seem to be any exceptional circumstances to justify the removal of Normandy and Flexford from washed over green belt status.

1. **CONSULTATION.**
Certainly there has been no consultation with Normandy residents (which I believe government guidelines advocate.) Most of us have chosen to live here for its rural location. Our shops and Pub closed through lack of use, and although it would be nice to have these amenities, not at the price of this developer-led overdevelopment. Our lives will certainly not be improved by this plan.

Finally, how can it be reasonable to almost double the number of homes in this village? The area will be completely ruined and just be a dormitory town for Guildford, instead of part of a green buffer between Guildford and Aldershot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Policy A25- I object to this policy as it is unsound and is not positively prepared. The proposals for the development of Gosden Hill Farm would make traffic movements in Burpham quite horrendous and doesn’t take into account land that should be reserved for a tunnel. This will have a significant knock on effect in Merrow.

Provision must be made for 4 way access to the A3 and not for the 2 way access proposed.

I do not support a new railway station in Merrow unless there is a new footbridge over the railway line and the bridge under the railway line is re-built.

The common land in Merrow Lane must be protected and must not become an access for any development on Gosden Hill Farm

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6453  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposal for development of Gosden Hill Farm that will cause traffic chaos in Merrow and Burpham and should be withdrawn- not least because the infrastructure is still no more than an aspiration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3739  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A43 and 43A- I object to the inclusion of A43 as the site is a flood risk and to A43A on the basis that there must be a 4 way junction north of Potters Lane at Gosden Hill Farm and therefore there is no need for slip roads onto the A3 at Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Policy H1- the University of Surrey should be required to build more than 60% student accommodation and to make full use of the planning applications that have already been approved for student accommodation.</td>
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<td>Policy H2- the policy should require that a proportion of smaller houses should be built as well as smaller apartments. Developers prefer larger houses but there is great demand in Guildford for smaller houses as starter homes or for older people who wish to downsize</td>
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Policy I 1- I object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion to a level that would be totally unacceptable. The traffic is bad enough now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8014  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2- the policy is unsound as it does not follow the NPPF nor the advice from DCLA Ministers on the preservation of the Green Belt. The Green Belt around Guildford is under attack from all sides. I came to live in Guildford because it has not been spoilt by massive developments and is surrounded by lovely countryside. I have no wish to see the Guildford environs ruined in the way proposed.

What right have we got to rip up the countryside that has been protected for generations? We must protect our countryside for generations to come as once the Green Belt is lost it is lost for ever. We must follow the Government guidance in the NPPF to the letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13529  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. On Green Belt I object to the massive erosion that is proposed simply to meet a challengeable housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8015  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5- the policy will have to be reviewed as a result of the UK’s decision to leave the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2- the policy is unsound as the G L Hearn OAN is too high and should be set at no more than 510 new homes per year in accordance with the advice of NM Strategic Solutions Ltd. It is unacceptable that no one has been permitted by GBC to cross check the work of G L Hearn and the independent analysis by NMSS makes it clear that there are a number of errors and flaws in the G L Hearn SHMA which should have been picked up and corrected by GBC before the report was approved and published. I take the view that the current GL Hearn SHMA has been discredited.

As GBC will be aware this NMSS report can be found on the Guildford Residents Associations website.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S2- this policy is unsound as the housing target has been inflated; the housing target should be corrected to a figure which is significantly less than the OAN as the final housing target must reflect the impact of the constraints described in the NPPF and which have not been applied across the borough.

Policy S2- I object to the policy as it is unsound as it does not follow the NPPF, the NPG nor the advice of Ministers in the DCLA on constraints. This is a major flaw in the draft Local Plan that I find extremely disappointing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1172  Respondent: 15458081 / K C Meldrum  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it is unsound since it contains no town centre masterplan and because too much space has been allocated for retail use that could be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1589  Respondent: 15458081 / K C Meldrum  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I am concerned at the amount of paper that one has to read to understand the key elements of the draft Local Plan. I am equally concerned at the short timescale for the consultation- 6 weeks is too short.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/880  Respondent: 15458081 / K C Meldrum  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1- the university of Surrey should be required to build more than 60% student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/888  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID1 – The transport aspects of the Plan cannot be regarded as sound. The Plan provides a vivid description of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/884  Respondent: 15458081 / K C Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2- The policy is unsound as the OAN is still far too high and should be set at no more than 404 new homes per year in accordance with the advice of NM Solutions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPA16/1861  **Respondent:** 15458113 / Shalford Village Hall (A Cooper)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We are very concerned about the latest version of the proposed Local Plan issued on 6 June 2016 in relation to the fields behind Shalford Village Hall. The Plan removes the fields from the Green Belt and puts them in the Shalford Settlement Boundary. As this removes the current long established Green Belt protection it would encourage the developer who has an option on the land to submit housing development proposals with access to Chinthurst Lane.

It is noted that the Plan does reserve these fields for "Open Space" but we understand that as currently notated on the Shalford plan, it is not as strong as its current Green Belt status and will be open to challenge. We believe the Borough Council shares the expressed view of the local community that this land should be left undeveloped. Therefore this intention would be best met by retaining this land in the Green Belt with its additional AGLV protection.

Regarding the site, the fields rise up 32 feet from Kings Road and over 25 feet above the Village Hall. Any development would be clearly seen from the Village Common and could dominate the tennis courts and bowling green. Aerial maps used to draw up new settlement boundaries do not take into account high elevation of land or any protected status.

The gift by the late E. C. Wigan in 1962 of the land for the main Village Hall building was made for the inhabitants of Shalford "for use for meetings ....... and otherforms of recreation and leisure time occupations ". The Village Hall site and the open space around it has been the vision of many residents for over 50 years. The facilities offered -including the 3 tennis courts and bowling green and open space - are a significant amenity value and are important in providing an attractive setting for the village. There is a real possibility that the recreational facilities could be expanded in the future: for example adding more tennis courts. We are very anxious to keep these options open and retain the site benefits for future generations.

In summary the proposed Green Belt boundary is in the wrong place by enclosing these fields on the edge of the village within the built up area of Shalford. Only a small adjustment to the 2003 boundary plan is necessary to reflect the 1999 development behind the Village Hall and thus keep its Green Belt status. We ask that full and sympathetic consideration be given to this objection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1863  **Respondent:** 15458209 / A. Gent  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to Send village being removed from the green belt
- I object to building 45 houses at Clockbarn Nursery
- I object to building 400 houses and 7000 sq meters of industrial space at Garlick’s Arch, opposite Send Marsh Road
- I object to 40 houses and 2 travellers pitches at Send Hill
- I object to a new interchange with the A3 at Burnt Common.
- Losing our Green Belt I feel is unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1862  Respondent: 15458273 / Laila-Marie Latin  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3742  Respondent: 15458273 / Laila-Marie Latin  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8018  Respondent: 15458273 / Laila-Marie Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8019  Respondent: 15458273 / Laila-Marie Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1865  Respondent: 15458369 / Julia Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
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- c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
- d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
- e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
- f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

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I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8023  Respondent: 15458369 / Julia Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8022  Respondent: 15458369 / Julia Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1866  Respondent: 15458433 / K Chaimon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have lived in Chilworth for nearly forty-seven years, during that time we have seen the village expand with more houses being built we really don’t want any more. The traffic gets really bad through the village, it would be even worse if more houses were built, let’s keep Chilworth as it is, a country village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8048  Respondent: 15458465 / S.J Pink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object Strongly to the 2016 draft local plan.

At eight o’clock in the morning the traffic going through Burpham is horrendous as it is without adding to all the extra cars if all these houses were to be built on GREEN BELT LAND and the schools are full in this area. The hospitals cannot manage as it is, so it would be absolutely ridiculous to build on this piece of land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3750  Respondent: 15458497 / Stephen Clennell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all the GBC Plans and Proposals to build on Green Belt, most importantly the sites known as **Wisley Airfield/Three Farms Meadows** and the Woodland known as **Garlic Woods** on the Send/Ripley boarders.

Even the consideration of developing the FWA/TFM area – which would be a small town - with a potential population of 5000 plus – is clearly ludicrous.

The application should be **refused** once and for all on a whole host of grounds:

1. 4000 additional cars in the area
2. Effingham and Horsley stations overcrowding
3. Road casualty numbers and serious delays at Ockham Interchange
4. NO2 and CO2 pollution
5. Sewage problems
6. Water drainage – Already Ockham Road North floods – and Surrey CC seem impotent to stop it.
7. No secondary school places available in the area
8. Rural flora and fauna damage (SWT have recently butchered an area in The Forest (East Horsley) which was the environment of Wrens, Blue Tits, Black Caps and rabbits with seeming impunity
9. The ‘lungs’ of London – the green areas just outside this massive urban area - have to be sacrosanct.

Clearly people without any vision will only wake up when all the land within the M25 and ten miles outside is all concrete. Then, there will be difficulties with sewage inadequate water supplies and nowhere for flash-flood water to go except into people’s homes. Surely the cruel lessons in December/January in Cumbria 2015/2016 must be learned?

The only answer to Guildford housing requirement – and who, by the way, are these people who come up with a figure of 400/500/600 new homes a year?….These figures are never justified to the general public, - must be smaller developments throughout the Borough.

I do not just mean the occasional new house. I mean significant developments like the proposed 120 housing in Send Marsh. This will make significant contribution to housing requirement without any impact on the roads, sewage, water system etc.

As I have said new housing is necessary, but I think that GBC Planning department must move their mind-set into the 21st century. For example – why not decree that all new builds MUST be a minimum of three stories + a basement if a fourth is desired.

By definition, then, all dwellings will require a smaller footprint, which means that dwelling density can be greater and more can be built per acre.

Just finally, and returning to my reason for writing I have read and heard literally thousands of people with a whole host of reasons why the Wisley air field project should **NOT** go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

I am writing to tell you of my objections to the plans for more houses to be built in East and West Horsley. Firstly the Prime minister and conservative government said, on more than one occasion, “No ifs, no buts, no infringement into the green belt.

Furthermore, the plans contain no provision for new schools or medical facilities, both these are already over crowded.

I ask you to stick to your word and refuse these plans. The prime ministers also said that the ideal was to build whole new towns, in new areas with the requisite facilities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Furthermore, the plans contain no provision for new schools or medical facilities, both these are already over crowded.

I ask you to stick to your word and refuse these plans. The prime ministers also said that the ideal was to build whole new towns, in new areas with the requisite facilities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The development proposed for Wisley Airfield would have a huge impact on the region, the roads and junctions are not suited to taking more traffic. The M25 and A3 junction is already one of the most polluted areas in Europe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the proposal to build homes within the Green Belt. We were promised repeatedly that this would not happen, except in exceptional circumstances. There are no such circumstances. Our schools and medical facilities are already overstretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/8047  Respondent: 15458593 / Jennifer Shute  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This area of the country is already over crowded. The conservative government has said it would build whole new towns on the North and Midlands not in towns on the overcrowded S.E. They should honour their promises and manifesto.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1314  Respondent: 15458593 / Jennifer Shute  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing again to object to the plans for houses in the green belt area around the Horsleys. As well as losing the green belt the schools and medical facilities are already overstretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1872  Respondent: 15458753 / Joan Gent  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to send village being removed from the green belt
2. I object to building 45 houses at Clockbarn nursery
3. I object to building 4000 houses and 7000 sq meters of industrial space at Garlick’s Arch
4. I object to the development of 40 and 2 travellers pitches at Send Hill
5. I object to a new interchange with the A3 at Burnt Common

I strongly object to all the above proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1876  Respondent: 15459041 / Jennifer Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Is it right that 30% of new homes are built in brownfield sites and 70% in Green Belt?

West Horsley is still a village but in great danger of becoming an urbanisation

The infrastructure is totally inadequate. I cannot park my car now at the station after 10am in the morning

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1877  Respondent: 15459297 / Mark Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Finally the most important objection:

I OBJECT to Send village being removed from the Green Belt.

This fantastic legacy from our Victorian Philanthropists was always intended to be permanent, as required by the National Planning Policy Framework. There are no special circumstances to justify abandoning this fantastic legacy.

The Green Belt in Send provides an ESSENTIAL Buffer, stopping Woking and Guildford becoming one conurbation. The GBC Councillors and Government gave clear election promises to protect the GREEN BELT. This plan blatantly reneges on those promises, and goes against Government Guidelines as pointed out by Sir Paul Beresford our local MP.

This would be a Developers Charter to provide unlimited development all over our Village and some other villages.

Please do not allow this dreadful error which will be irreversible

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to building 400 houses and 7000 sq meters of industrial space at Garlicks Arch opposite Send Marsh Road.

This is green belt land with ancient woodland, and is prone to considerable flooding. The industrial space is definitely not needed as there is adequate space at Slyfield Green, and the owners at Slyfield are keen to have extra use there if there is in fact a need at all for extra industrial space.

If GBC used the brownfield sites this green belt land would not be needed.

The gridlock that this development would cause on the local roads would make the already overly congested and busy roads impassable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3758  Respondent: 15459297 / Mark Murphy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this proposed new interchange with the A3 at Burnt Common because much of the traffic to and from the A3, the M25, Woking and Guildford would be going through to Send Road which is already at full capacity. It would be total gridlock as this road funnels into a small roundabout and very small congested roads in Old Woking.

The proposed junction would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm, this would be a total disaster for the Village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3757  Respondent: 15459297 / Mark Murphy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the development of 40 houses and 2 Travellers Pitches at Send Hill.
A totally inappropriate location with very narrow Roads with single tack roads with insufficient access.
The subsoil here contains documented unsafe landfill waste registered at GBC.
This development would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1177  Respondent: 15459297 / Mark Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition I attach the reasoned objections to the whole dreadful Guildford Plan which is opposed by virtually all the Villages Around Guildford and most of the Guildfordians and our local MP Sir Paul Beresford. Compiled by Andrew Procter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Andrew Procter Objection to GBC Local Plan 11 July 2016.doc (267 KB)

Comment ID: PSLPA16/1878  Respondent: 15459329 / Patrick Wills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am so sad for the village of West Horsley where I lived and was brought up.
The high density proposals will be an enormous burden on the infrastructure and the plan does not appear to address the provision for schools, surgery, roads, parking etc etc etc. A real worry

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPA16/1883  Respondent: 15459841 / Lorraine Tribe  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The proposed housing developments in West Horsley would completely overwhelm the village. Drainage would be a major concern as it is inadequate at present.

Similarly road and school capacity, station and village car parking capacity, doctors surgery and shops capacity would all be overwhelmed.

The proposed developments would be as out of place here as they would be in Send, the Clandons and Ockham village.

Any Major developments would be better placed in the west of the borough – Normandy, Ash and Tongham, where there is much more open land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPA16/1881  Respondent: 15459873 / Richard Horn  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/3760  Respondent: 15459873 / Richard Horn  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Page 1406 of 2543**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8055  Respondent: 15459873 / Richard Horn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8056  Respondent: 15459873 / Richard Horn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8061  Respondent: 15460033 / Gavin Nottage  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am Emailing to object to the plan to remove the green belt protection for the village of Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15650  Respondent: 15460033 / Gavin Nottage  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I wish to object to plans to remove the greenbelt from Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1892  Respondent: 15460129 / Simon Kirkpatrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

I am a resident of Send Hill and am appalled by the proposals by the Council to remove Send Village from the Green Belt, which was intended to be permanent under the National Policy Planning Framework.

In particular:

* I object to the development of further houses at Send Hill.
* It would be detrimental to what is currently a quality Green Belt amenity and area of beautiful countryside.
* I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

* I further object on the basis that the existing site contains documented unsafe land fill waste.

* I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.

* I object to the proposal for two Traveller Pitches. The Pitches would be completely inappropriate due to the narrow width single track country road, providing insufficient access to the site.

* I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.

* I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.

* I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.

* I object to the proposal in the local plan on the grounds that Send Hill is a narrow road resulting in loss of a turning point for vehicles.

* I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

* I object to the proposal in the local plan on the grounds that too many houses are proposed to Send and the impact on traffic congestion and local services would be unacceptable.

* I object to the proposal in the local plan on the grounds that Send Hill already suffers from significant congestion, particularly at peak times such as during the school run.

* I object to the local plan on the grounds that it could result in 92 extra cars in Send Hill, which already suffers from limited parking.

* I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.

* I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property, Greystones.

* I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

* I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

* I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

* GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

* I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with...
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* I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.

* I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the International Journal of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

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* I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

* I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as a local authorised landfill site as licences under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.

* I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes me concern as to what it does contain and dangers if disturbed.

* I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according the government companies’ site.

* I object to Send Village being removed from the Green Belt. It was intended to be permanent and there should be no special circumstances for removing such an important feature of our environment.

Please ensure that my comments are show to the Planning Inspector, and confirm receipt of my e mail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a resident of Send Hill and am appalled by the proposals by the Council to remove Send Village from the Green Belt, which was intended to be permanent under the National Policy Planning Framework.

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* I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

* I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according the government companies’ site.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/1901</th>
<th>Respondent:</th>
<th>15460289 / Nhora Riederer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection regarding the impact of Guildford Borough Council’s current Draft Local Plan and in particular object to its impact on West/East Horsley and its immediate environment and its disregard for the existing designation of Green Belt Protected Areas for which I believe no valid case has been made or exceptional circumstances proven.

I think the demand for housing is artificially fuelled by people living longer and by the high level of immigration into the country. You should be building retirement homes not housing estates and the effects form the second issue needs to be look up following the country’s decision to leave the European Union.

I also object to the proposed changes to the village settlement boundaries in particular where there is no proposal to build new houses, I can not imagine what reason could there be? It is obviously a hidden agenda to permit further building in these areas at a later date without having to obtain separate approval in the future.

I should also like to state that the extent and number of new houses proposed in the Horsley’s, area is totally out of proportion to any local requirement, there is no industry or business case for increased housing on this scale which I think is about 40% increase in West Horsley’ if new housing is required it would be better to site it close to where that need really is.

The vast number of new residents commuting in and out of the area would put a massive additional burden on the existing road networks and transport infrastructure that is already buckling under the weight of lack of investment or maintenance by Guildford County Council – Have you tried driving down ‘Long Reach’, ‘Ripley Lane’, ‘The Street’, ‘East lane’ in winter? When flooded and is waisting on the sides.

Where are do the new residents on the proposed of houses are taking the children to school? It would put an unsustainable strain on the local schools. When we moved to this area 12 years ago we struggle getting our son into the local Primary School and there are annual arguments over catchment areas between the local villages just to get children into the nearest Secondary Schools. The proposals do not address these problems adequately they would just make them worse and mean parents would have to drive their children to schools many miles away. What about hospital and Dr surgery?

The increase in housing will also strain the services infrastructure, local sewage and drainage requirements are overloaded.
as can be seen after a heavy downpour water floods over Ripley Lane and The Street between the Railway Bridge and Long Reach due to many natural springs in the area. Localised flooding will of course be compounded by the proposed new homes the plans take no account of this.

A couple of years ago heavy construction lorries were employed at Jury Farm for a couple of months in Ripley Lane and the Road was structurally damaged as a consequence and has still not been satisfactorily repaired. Building in the local area on the scale proposed will never be made good by the construction companies lining up to build on nice Green Field Sites.

I note that in the latest version of the local plan that the Station Parade in East Horsley has been designated a District Centre which is incorrectly identifying the village facilities in order to justify inappropriate development of the area.

I urge the Council to-

a) Think again on a local scale and consider what is actually needed by the people living in the borough.

b) Go back to Central Government and seriously question the whole premise of this notional housing requirement. Do we really need so many houses in such a small area? when it will only compound the pressure on local facilities and have a major negative impact on the local environment, adversely affecting the quality of life of all those currently living around Guildford.

I am sure that there is plenty of room for new housing and properties that could be refurbished in other parts of the country, without the impact to sensitive environmental and designated Green Belt or conservation areas where effort should be put to regenerate both jobs and industry supported by investment in affordable housing.

I really hope you take us serious and try to find a solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Garlick’s Arch site with the change of this land- it is ancient woodland, of local beauty and floods. I object to the 400 houses and the 600+ cars. The local roads are already heavily congested at commuting times let alone with more added, and also the pressure on local facilities. I object to the 7000sqm of industrial units at the Garlick's Arch site. I believe there are other brownfield sites that are more appropriate for industrial units rather than greenbelt land?

I strongly object to a new interchange with the A3 at Burnt Common. Send will be a cut through and have to take the extra traffic from Woking and Guildford and also the A3 and M25 for the proposed developments at Blackwell Farm, Gosden Hill, Wisley Airfield, and Burpham. Our main road, the A247 is already struggling, with regular crawling traffic/gridlock. The pollution and noise levels are already very high.

I object to the development of 40 houses and 2 travellers pitches at Send Hill because some the lane is single access and some parts winding and extremely narrow, to add even more traffic to an already struggling road would be dangerous. I have been gridlocked many times with traffic unable to pass along Send Hill and then blocking Potters Lane. It cannot be walked safely as a pedestrian. I used to travel on the school bus that was regularly stuck/trying to reverse to get passed other vehicles. Also I believe, the land is an unsafe landfill site.

I strongly object to the Clockbarn Nursery site with 45 houses because of the very inadequate access and busy traffic. Tannery Lane is very narrow and twisting. It is already very hazardous for traffic from Tannery Lane to join the Send Road. Traffic has to dangerously edge out, and often gridlocks Send Road. We already have the marina development going ahead and 60+ apartments, and I feel that this in it's own right will cause enough traffic concerns.

I appreciate that housing in the Guildford borough is needed but would ask that GBC put every effort looking into Brownfield sites in the urban area before the open countryside.

I would like my comments to be shown to the Planning Inspector and also a confirmation that you have received my communication.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

My main reasons are…

I object to the Local Plan as the following development proposed is not sustainable (Policy S1)

At least 148 more houses in East Horsley. At least 385 more houses in West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3766  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I OBJECT TO THE DRAFT LOCAL PLAN FOR THE FOLLOWING KEY REASONS:

1) 
2) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

3) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

5) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

6) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

7) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4213  Respondent: 15460353 / Elizabeth Hewlett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.
The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4215  Respondent: 15460353 / Elizabeth Hewlett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.
The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPS16/4216</th>
<th>Respondent: 15460353 / Elizabeth Hewlett</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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The site is not appropriate because:
- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/4214</th>
<th>Respondent: 15460353 / Elizabeth Hewlett</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8900</th>
<th>Respondent: 15460353 / Elizabeth Hewlett</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8902</th>
<th>Respondent: 15460353 / Elizabeth Hewlett</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1).
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity. There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17724</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1).
The Plan does not identify adequate infrastructure improvements to support the huge scale of development envisaged in the plan. Local services, utilities and sewerage, doctors etc. are at or close to capacity. There are no plans to improve the capability of the medical and police/emergency services to cover the huge scale of development envisaged in the plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8903  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8901  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)
The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8897  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<th>Comment ID: PSLPP16/17721</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/8898</th>
<th>Respondent: 15460353 / Elizabeth Hewlett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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I further object to both villages to be taken out of the Green Belt. The new boundary, (called the in-setting boundary) extends the old settlement boundary and includes some fields and open spaces. This means that Kingston Meadows (by East Horsley Village Hall) is included inside the insetting boundary – despite being a valuable green space. Horsley Tennis & Cricket club at the end of Pennymead Drive is also inside the insetting boundary.

This is totally unacceptable. I object to not protecting the Green Belt (Policy P2)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.
The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8896  **Respondent:** 15460353 / Elizabeth Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve infrastructure for Garlick’s Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8899  **Respondent:** 15460353 / Elizabeth Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging
urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17723  Respondent: 15460353 / Elizabeth Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3767  Respondent: 15460385 / Kate Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is brownfield land in the urban areas which needs to be regenerated, without the need to encroach on so much protected Green Belt land.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The Green Belt serves a vital role in protecting against urban sprawl from London. Development on the Wisley site will potentially open the way to creating an urban corridor stretching from London to Guildford. Have exceptional circumstances been established to warrant removing the land from the Green Belt?
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high.
- I object to the disproportionate allocation of housing in this particular part of the borough. 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.
I object to the threat the Local Plan poses to the rural village of Ockham. The plan will mean the village of 159 residences could be subsumed into a 2,000+ dwelling development.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes could result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

Has sufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI)?

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers.

I trust that these objections will be fully considered and that the former Wisley Airfield (Three Farms Meadows), Allocation A35, will be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3698  **Respondent:** 15460417 / Michael Amor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1880  **Respondent:** 15460417 / Michael Amor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.
Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1879  **Respondent:** 15460417 / Michael Amor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3770  **Respondent:** 15460449 / Alexander Paton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
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- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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**Attached documents:**

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<tr>
<th>Comment ID: PSLPA16/2227</th>
<th>Respondent: 15460545 / Tracy Salmon</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Outlined below are my objections to the Guildford Local Plan.

? West Horsley is defined by Guildford Council as a Green Belt Village.

? Policies in the Governments National Planning Framework (NPPF) require that new building is regarded as inappropriate in the Green Belt.

? These Policies also say that only limited infilling with Housing is appropriate.

? Neither of these policies support substantial new development in the green belt.

? The Councils Proposals total some 500 new dwellings in the green belt, which is clearly contrary to the above policies.
Previous objections to the Local Plan by West Horsley residents have been totally ignored by the council, who have shown no community engagement in producing the current plan with the increase in housing and the expansion of the village contrary to their wishes.

In producing the new Local Plan larger sites are proposed west of Guildford to reduce the pressure on the green belt. No benefit is evident to the residents of West Horsley from this reappraisal and in fact an increased requirement for housing in their green belt is proposed.

The existing roads, schools and health facilities have no plan for funding set out in the plan to address 500 new houses.

Several of the new sites proposed extend the built area out into the countryside, which is clearly damaging to the Green Belt where any new building is regarded as inappropriate in government policy.

The council are proposing new village boundaries which extend the built area outwards into the green belt, again clearly damaging to the Green Belt where any new building is regarded as inappropriate in government policy.

The proposed new development has been focussed on West Horsley with no Special Purpose being defined as required by policy to promote development in the green belt.

The protection of Birds in the special protection area near Wisley requires special consideration within 5 km. All of the sites in West Horsley and the site at Wisley Airfield are within this 5km. Any new development requires the possible effect on the birds to be addressed by the provision of alternative open space to draw residents away from Wisley. Effingham Common has been identified to serve this propose but in order to be usable for this purpose it requires a public car park which it has not got. Common Rights and planning permission issues may well stop this ever coming forward. This puts in doubt the feasibility of the sites in the long term.

For all of the above reasons I object to the Local Plan and request that the minister addresses the green belt points and confirms that West Horsley remains a green belt village, recognises the uncertainty relating to the protection of the birds and that as a result removes the pink coloured sites as development sites from the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/4336  **Respondent:** 15460545 / Tracy Salmon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

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Please find below my objections to the Guildford Local Plan.

West Horsley is defined by Guildford Council as a Green Belt Village.

Policies in the Governments National Planning Framework (NPPF) require that new building is regarded as inappropriate in the Green Belt.

These Policies also say that only limited infilling with Housing is appropriate.
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I object to the draft Local Plan for the following key reasons:

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• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp173/240  Respondent: 15460545 / Tracy Salmon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object very strongly to the latest draft of the GBC local plan.

This draft is still proposing to remove East Horsley from the Greenbelt. Development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham & Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to meet this increased demand.

The whole point of Greenbelt is to protect our countryside. 57% of the new housing proposed is on Greenbelt land. This is outrageous!

Since Brexit, forecasts of increasing population numbers have been reduced. Why are you trying to increase our housing stock by 22% when the new forecast, since Brexit, has gone down to 10.4%?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3778  Respondent: 15460641 / Isobel Fish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix 1: Housing Need

Please refer to separately attached report by Neil McDonald of NMSS entitled, “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford.”

Neil McDonald is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues.

He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit until its closure in 2010. He left the Department in March 2011 and has since worked with the Cambridge Centre for Housing and Planning Research (CCHPR) as a Visiting Fellow (2012-15), collaborating in particular with its founder director, Professor Christine Whitehead.

Appendix 2: Transport Infrastructure Part 1 and Part 2

These reports, the first looking at highways and traffic, the second at transport other than the strategic and local road network, are prepared by Richard Jarvis BSc, MS, CEng, FICE, FCIHT.

Richard Jarvis is a retired planning and management consultant. He has many years’ experience as a transport planner, managing a wide range of projects in the UK and around the world. He led studies for highways, city planning and public transport. He has acted as an expert witness at public inquiries.

**COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE**

**Highways and Traffic**

1. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The Plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

2. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by SCC at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions in the borough from 2009 to date. It represents today’s circumstances, with the addition of growth in traffic to 2031 outside the borough and in Waverley in line with their plan. The results for this scenario correspond to the current unsatisfactory traffic conditions in peak periods.

3. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the Plan. The Scenario 5 results show that there will be widespread congestion in the morning peak hour across the network in 2031. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11 will be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHAR results provide evidence that congestion will be worse in 2031 than it is today on much of the network.

4. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services
will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre.

5. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

6. The cumulative effect of the additional traffic generated by the developments in the Plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we do not accept the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.

1. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major improvement scheme being studied by Highways England for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore there will be a period in which the existing A3 will have to carry additional traffic associated with those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

- Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey Research Park and the RSCH through the development (para 4.7.3)
- Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8)
- Wisley Airfield – traffic will increase on minor roads to gain access to the A3 (N and S bound) and to other routes (para 4.7.11). The development will add more traffic to the A3. The Burntcommon slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)
- Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane,B3000 junction, but increasing at the Puttenham Hill/Millbrook junction
- Ash – development in Ash is not specifically addressed, but there are large increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction)
- Slyfield – there are no remarks relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted in error. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane
- Town Centre – the report has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. There are no highway mitigation measures in the PSLP for the centre. In the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined in the SHAR, but traffic using the A281 from Waverley, for example, would be affected. The PSLP does include a new park and ride facility at Gosden Hill and the Sustainable Movement Corridor, which is discussed in a separate note.

1. The PSLP does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks
through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

2. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the PSLP. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, to which they are unsuited. The model results show an increase of 47% over 2009 in Scenario 5.

Appendix 2: Transport Infrastructure Part 2

COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE – part 2

1. Appendix C of the Plan includes the following categories of transport infrastructure in addition to the Strategic Road Network and the Local Road Network which are discussed in a separate note:

- Park and Ride
- Sustainable Movement Corridor
- Bus Transport
- Active Modes
- Rail

Each of these is considered below.

Park and Ride

1. There is one Park and Ride project in the Infrastructure Development Plan which is a new facility at Gosden Hill Farm. This is to be delivered by the developer of the site and the Transport Topic paper states that the intention is that it will operate without any public funding with 500-700 spaces. It is expected that the site will be use by drivers on the A3 southbound heading into Guildford town centre (TTP para 5.60). It is not clear how this ‘mitigates the traffic impact of the Gosden Hill Farm site’ (PLSP App C P&R1), though there could well be residents of the new development who may choose to use the P&R bus service. The Park and Ride facility is not related to the proposed new Merrow Station.

2. There is an absence of any park and ride proposal east of the town centre, which would surely benefit from one.

Sustainable Movement Corridor

1. This is an ambitious concept. Policy I3 in the Plan states that the SMC ‘will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists’. It will link the new developments in the west to those in the east via the town centre. It is estimated to cost £70-90m, with funding coming from developers and the Local Growth Fund. The recognition of the importance of sustainable travel is welcome. Connecting new developments to the town centre, as in the case of SMC1 and SMC2, is sensible, but the need for a ‘corridor’ is unproven.

2. The latest information on the project has been supplied in a paper ‘Progress Update on the SMC Scheme’ published by GBC on 6 June 2016. This explains that studies have been carried out for sections 1-5 of the proposed route, and further work is needed. The SMC will use existing roads for the majority of its length, so this means that it will affect the allocation of carriageway between road users. Two design formats have been identified, ‘type 1’ involving separate lanes for the SMC, and ‘type 2’ in which bus priority measures are introduced at congestion sections and interchanges. The majority of the route is likely to be ‘type 2’ according to Table 1 of the Progress Update. This will be challenging because the road width on several sections will limit what can be achieved without a major impact on other traffic.

3. The Plan states in para 4.6.24, that ‘journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the SMC. Securing funding from the Local Growth Fund requires an economic justification.

Bus Transport
1. There are two projects in the Plan relating to buses. The first is labelled ‘New Guildford town centre bus facilities’. This is essential and the absence of a site for a bus station in the Plan is a serious weakness. Delivering a focus for town centre bus services and the SMC surely should be a key feature of town centre planning. The improvement of bus connections to the station is also needed.

2. The second project is for bus/rail interchange at Effingham Junction station (or Horsley) is desirable if the Wisley Airfield development proceeds.

Active Modes

1. The schemes listed are welcomed.

Rail

1. There six projects listed in the Plan of which four will be delivered by Network Rail as part of their investment programme. The other two are the new stations, Guildford East and West, which will increase rail access to development sites, and the hospital in the case of the West station, and are to be welcomed for that reason.

2. The Plan does not deal with the fact that the Portsmouth/London main line is extremely busy in peak periods. Commuters from Guildford to London frequently have to stand, and this is in spite of longer trains having been introduced. Capacity is limited in the area between Surbiton and Waterloo and this is the focus of Network Rail investment (project NR5) that is scheduled to start in 2029. The growth proposed in the Plan for Guildford will undoubtedly mean more people will want to commute, adding to pressure on the congested services, in the period before the frequency of services can be increased.

Appendix 3: University Student Housing

Background

Guildford is preparing its Local Plan and is trying to identify housing provision for the future. The Council has indicated that there is a particular problem in meeting short-term housing needs (years 1 to 5).

The University has approximately 14,000 FTE students, half of whom live off-campus. This means that around 7,000 students live in the town centre, occupying homes that could be made available for University staff and other key workers. The GRA believes that a policy by GBC to ensure that the University accommodates 80-90 per cent of its students on its existing campuses (which it could implement over the next three years without affecting any existing students) would greatly help the housing situation as it would quickly free up 1,000 - 2,000 lower-cost houses close to the Hospital, Research Park and University.

Dedicated student accommodation would provide a range of other benefits to students and to Guildford:

Better for students:

- **It is more affordable for students** - there are economies in providing dedicated facilities with communal areas, shared services (such as broadband access and shared laundry facilities). Currently students compete for accommodation on the open market meaning that landlords charge rent outside of term time (when students often do not require accommodation).

- **Dedicated accommodation would be more appropriate** - it is not unusual that a bedroom in a shared house may be no more than a box room perhaps with no windows, in a conservatory or cold attic. It is not unusual that flatmates need to pass through a bedroom to visit the bathroom, use the kitchen or even to get to the front door. Purpose-built accommodation does not present any of these problems.

- **Living on campus would be safer for students**. Some students are living in cramped, substandard conditions. The condition of dedicated student accommodation would be easier to regulate (provision for fire escapes etc). It is also easier to ensure safer travel for students at night through the provision of transport.

- **Students would have the benefit of a guaranteed residence throughout their studies**. Not all first-year students were allocated rooms on campus last year and many struggled to find accommodation in the town, which caused stress.
• Students can still enjoy the benefits of town life. Unlike many universities, the University of Surrey’s main campus at Stag Hill is just a stone’s throw from town centre so students will not miss out on Guildford’s night life etc.

• Students perform better - Several US studies have shown that students who live on campus perform better academically than those who live off-campus (see http://www.iub.edu/~caepr/RePEc/PDF/2010/CAEPR2010-002.pdf)

Better for Guildford:

• There would be fewer traffic movements, and fewer problems with students parking in residential areas. Students living on campus are less likely to bring cars. (In parts of Ashenden there are four cars per student house) NB. In 2002, the University promised that Manor Park would be a “world-class car-free campus”.

• If there were a dramatic swing in student numbers in the future, voids in student residences could be passed back to offer homes for local people, such as nurses. Plans for the new student accommodation at Walnut Tree Close already allow this.

• There will be improvements in neighbourhoods vacated by students, such as Onslow Village and Park Barn, when the houses provide accommodation for families and key workers throughout the year. Businesses in Guildford Park Avenue have struggled and some have closed down because local houses are occupied for just 30 weeks of the year. It would also help to tackle issues (described in the Local Plan Issues and Options document) “with noise and disturbance, car parking and sometimes with the general upkeep of the rented property”

• Under a 2004 Section 106 agreement (Section 15), Hazel Farm will be released by the University to provide housing for Guildford once 2,500 units have been built on Manor Park. Whilst the site cannot be used for family housing (because of its proximity to Whitmore Common SPA), Natural England would allow the site to be used as a care home. The usage would seem appropriate given the ageing population often cited as being a reason for population growth, and it would help towards Guildford’s housing supply numbers.

Is this a viable option?

• There are precedents for having nearly all students live on campus - seven out of the top-10-ranking US universities accommodate more than 86% of students on campus - Harvard has 98%. In the UK, Oxford City Council’s Local Plan includes a policy which limits the number of students in the private housing market to 6,000 out of a student population expected to reach 40,000 in the near future.

• The University has ample space on its Manor Park and Stag Hill campuses to provide this accommodation.

• There would be no cost to the University. The University could opt for a lease/leaseback deal with Unite (one of the main student accommodation providers), which would include a five-year fix on student rent with a pre-emption on buy back for the University.

Some numbers in detail:

According to the University website, it provides the following number of beds:

Stag Hill: 3,002
Hazel Farm: 349
Manor Park: 1665
Total: 5,016

From the 2011/12 Financial Review, there are the following students:

Undergraduates: 10,878
Postgraduates: 3,157
Research: 1,174
Total: 15,209 (NB this includes some part-time, so the Full Time Equivalent (FTE) number is 13,576)

Student preference is an argument that the University has used in order not to build its student housing.

1) The majority of students attending Oxford University are not given the option to live in shared accommodation in town, and this does not prevent them wanting to go there.

2) Many students actively want to live on campus and want the security of knowing that they have a roof over their heads for three years. The student halls are filled every year. A number of students, for example in Onslow Village, would have preferred to remain on campus, but say they were unable to do so.

3) In 2002, when the University was pushing to take Manor Farm out of green belt, it argued that students wanted to live in student halls and that not having enough on-campus accommodation meant that it was losing students to Kingston. It also stated the following:

“The provision of on-campus accommodation for over 60% of students is a benefit of very substantial significance. On-campus accommodation is cheaper than renting in the private sector and students are closer to the University’s facilities. Other benefits include a subsequent reduction in housing demand in Guildford, further enhanced by the release of University land at Hazel Farm for general housing provision.” - University of Surrey, Manor Park Non Technical Summary (para 19/20), November 2002.

The University now promotes the opposite argument suggesting that students prefer to live in town. Pressure for housing in the town suits the University's case to develop its land holding on the green belt.

4) GRA is not being suggested students currently attending UniS should be forced onto campus. This policy would only affect future students, ie those currently studying for their GCSEs. Future candidates would be applying to Guildford in the knowledge that this was a "campus university" in the true sense of the word.

5) It would be possible for the University to encourage students to live on campus by making the accommodation cheaper or by including accommodation costs within the student fees. Exceptions could be made for students who were married with families or who wished to live with their parents or who had other good reason for living in town.

Appendix 4: Link between Infrastructure and Development

Letter and Reply

Cllr Paul Spooner
Leader of the Council and
Lead Councillor for Planning and Regeneration

Guildford Borough Council

17 May 2016

Dear Paul

Link between infrastructure and development in the Local Plan

Site Allocation Policies A24, A25, A26 and A35

Following the Executive meeting on 11 May, I am writing to ask you to change the wording of your proposed policies designed to make development of strategic sites contingent on timely delivery of infrastructure.
We are concerned that the very strong statements being made by the Executive, that permission will not be given for development without requisite infrastructure being in place, are not reflected in the Plan. We ask for this to be put right before the Proposed Submission Local Plan is issued for consultation by the Council.

Could you please ask your lawyers to provide a stronger formula than *have regard to* which is simply too weak and will not work. Much time has been spent in Parliament firming up intentions that a *have regard to* clause has failed to deliver.

- Developers will drive a proverbial coach and horses through “regard will be had to the delivery and timing of delivery of”.
- There is also a danger that “or otherwise alternative interventions which provide comparable mitigation” will be used to justify a sticking plaster approach and to avoid investment in durable measures.
- We are also concerned that, as worded, the much needed Site Allocation policies on infrastructure could undermine the first paragraph of Policy I1 which states that “infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development.” and “Where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”

Weaknesses in the policies are made all the more critical by:

- the quantum of development proposed in combination with the scale of the infrastructure deficit identified by Surrey County Council
- the small proportion of infrastructure scoped, costed and in approved programmes
- conversely, the majority of infrastructure required being as yet poorly defined and reliant on inclusion in programmes beyond the current Spending Period, being either at the tail end of, or beyond, the Plan period.
- the poor track record of infrastructure being delivered in practice during the Structure and Regional Planning eras. The intention may be there to improve this under the new arrangements but the new system is untested.
- the immature status and lack of clarity around local infrastructure schemes.
- the possibility that decisions on planning permission will be made by inspectors, and not Guildford Borough Council, and that development may be determined at the outset by a new category of “in principle” permission.

Given this context, it seems to us that you are asking residents to take much on trust. In view of your clearly genuine intention, as Council Leader, to ensure that development is contingent on infrastructure being in place when required, we ask you to ensure your Policies A24, A25, A26 and A35 are redrafted to achieve this.

Kind regards

[redacted]

Guildford Residents Association

cc , Interim Director of Development, Guildford Borough Council

reply: <redacted>

From: [redacted]
Sent: 21 May 2016 20:05
To: 'Amanda'
Subject: RE:GRA Letter on Infrastructure following up Executive [UNC]

Hi Amanda,
I had seen this and asked Planning Policy to consider this as a consultation submission for review. To be absolutely sure please also resubmit during the formal process!

I agree with the sentiments of the letter.

Best regards

Paul

Cllr Paul Spooner

Leader of the Council

Portfolio responsibility for Planning and Regeneration

Councillor representing Ash South, Ash Green & Tongham

Guildford Borough Council

[redacted]

www.guildford.gov.uk

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LOCAL PLAN GRA Report FINAL.pdf (1.6 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

See comments on questions 1 to 3
Policy on green approaches needs strengthening
Land for A3 tunnel entrance and works areas needs safeguarding
See Appendix 4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3781  Respondent: 15460737 / Donna Collinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible terms to the expansion of Guildford as represented by this local plan.

I object to development within the green belt and In sight of the AONB.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worpleson and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review.

The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC's landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment)

**Transport survey for A26 Blackwell Farm.**

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

- The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
- The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this
bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.

- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital
- All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (eg Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

The full consequences of the proposed local plan are enormous and are only now emerging. For example, even if all the proposed highway improvements in the Plan were built, congestion would not improve. We would just have a lot more people stuck in traffic and traffic would get a very great deal worse to start with. In our area, Stoke next Guildford changes we would be likely to experience include:

- the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern
- more traffic from the major development sites coming in on the Stoke Intersection and London Roads
- roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development
- pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this.

Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
See comments on questions 1 to 3

See Appendix 4

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7890  Respondent: 15460737 / Donna Collinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A32

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to erosion of AONB or removal from Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7891  Respondent: 15460737 / Donna Collinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to erosion of AONB or removal from Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7892  Respondent: 15460737 / Donna Collinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

See comments on questions 1 to 3

See Appendix 4

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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See comments on questions 1 to 3

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

There is much to be welcomed in this policy and text.

4.5.5 and 3.5.6 We need a Local Plan Development Management Policies Document urgently. We will be vulnerable without development control and design policies in place. Can relevant policies in the 2003 Plan be saved, at least to fill the gap?

The policy to “provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists” is particularly welcome given experience of developers failing to provide this.

We warmly welcome the addition of promoting green approaches to 4.5.8 which reads “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.”

However, this approach should go beyond respecting to promoting. We propose that green approaches – both soft green edges to settlements and greenerly along roads into settlements - are such a valued, distinctive feature of Guildford that this should be in the policy itself to guide developers. For example, “green approaches to settlements and” could be inserted after “with” in the following:

“All developments will:...promote and reinforce local distinctiveness to create a sense of place, with [green approaches to settlements and] innovative architecture encouraged and supported in the appropriate context.” We suggest “and supported” is superfluous.

Green approaches to settlements are just as important as innovative architecture in Guildford. Promoting green approaches is a dynamic concept not a brake on development. It affects how you do things and applies equally well to the design of settlement extensions and to managing change in established areas. We rely so heavily on green approaches to shape change for the better at inquiries and when responding to applications. It will become more important during a period of growth if we want to retain the qualities that distinguish Guildford and prevent it being a “could be anywhere” town.

Monitoring Indicators

Again we are concerned to avoid perverse consequences, with the possibility of reluctance to refuse due to poor design to avoid the risk of unsuccessful appeals.

Object: seeking improvements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“a new retail-led, mixed-use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area.”

We question the wisdom of expanding retail floor space on this scale given the demand from competing priorities in our constrained town and given the need to ensure resilience for the high street in the face of trends in retailing.

“approximately 1,172 new homes, particularly on upper floors as part of mixed use developments; ”

Homes should not be confined to upper floors and care needs to be taken to ensure development heights are stepped to reflect the rise of the land. Extensive residential storeys, all on one level on top of large retail units, should be avoided.

Vision

The objective of giving pedestrians priority needs to be qualified. The extent of pedestrian areas needs to be tempered by the reality that Guildford is a crossing point in the downs and that its geography is not amenable to a ring road strategy that normally accompanies extensive pedestrianisation. If central roads are closed to through traffic, vehicles will be displaced to more residential and rural roads with unacceptable consequences. Further, steep slopes mean there is a requirement for access to transport along the length of the main shopping streets to help those who cannot cope with the gradients. This means you cannot adopt an approach of bus stops around the periphery of the retail area with no central interchange.

Object: See comments on questions 1 and 3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17353  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.2.1 We question the wisdom of adding you want to meet “demand”. For example, there has been demand by foreign investors for homes to be bought as an investment and left vacant.

“Development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted.”

This should be qualified with ”normally”. It will be necessary to be able to make adjustments to the number of homes given permission “in principle” or in outline where a site survey shows that the envisaged number of units cannot be accommodated without causing unacceptable impact (eg space is needed for sustainable drainage). Also, within the context that some town centre properties are changing from business to residential, it may be appropriate to make some changes
from residential to business. In some instances, it may not be inappropriate for a house in multiple-occupation to be reinstated as a family home.

**Density- Policy and Justification**

We strongly welcome this approach with an overall presumption and decisions taken on what is appropriate on a case by case basis. This has been a game changer in enabling positive schemes in Guildford. Previous targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

**Students**

“We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”

This percentage is far too low given the mix of pressures on Guildford as a university, London commuter belt and constrained gap town. We have a thriving University that is an engine for our economy and also for population growth. With that comes responsibility. We ask the University to provide far more campus accommodation making it attractive so 80-90% of their students will want, and expect, to live on campus. This will free up much needed affordable homes in the town. (See comments on Soundness and Annex 3)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

This has been reviewed in detail by Richard Jarvis, a qualified civil engineer and expert in transport planning. His reports of the transport modelling and non road proposals are attached in Appendix 2. Also see comments on questions 1 to 3.

The transport infrastructure proposals are best summed up by “too little, too late”.

The Sustainable Movement Corridor is only shown as a concept. Its reliance on existing roads means its impact will need to be assessed and we do not have any indication of use. For example, will London Road traffic be deflected along Epsom Road and what will happen to queuing time at junctions for traffic that is not prioritised?

An appropriate site for a central bus interchange, so you can go in any direction from one point, has not been allocated.

There is no additional road bridge over the river and railway for our physically divided town.

We strongly welcome the Leader’s clear call that development should be contingent on infrastructure delivery and the policy that infrastructure should be available “when first needed”. However, policy I1 needs to be considered alongside the infrastructure proposals in Site Allocation policies A24, A25, A26 and A35 184-192, 211- 212 for strategic sites. These are discussed here to avoid duplication.
The following wording is of concern: “regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation.”

We believe the weak wording “have regard to”, on which this policy hinges, needs to be tightened. Also the option of alternative mitigation could be used to justify a sticking plaster approach and to kick infrastructure provision into the long grass. We refer to our letter in Appendix 4 and the positive reply from the Council leader.

We are delighted to see reference to an A3 tunnel beyond the Plan period but we are concerned that land is not safeguarded for entrances or works areas. Even for projects within the Plan, it is not clear that all requisite land has been safeguarded (eg railways stations and sustainable movement corridor).

Object: Inadequate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.6.24 The Sustainable Movement Corridor will provide a priority pathway

The impact on non-prioritised users and knock-on effects for surrounding roads need to be assessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17362  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome this policy.

We propose that “slow the flow” and sustainable drainage schemes, intended to reduce flood risk, should be considered as also contributing to blue green infrastructure due to their wider benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17354  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We very warmly welcome improvements to this policy which better captures the importance and value of the AONB.

We further suggest the following clarifications to avoid ambiguity:

- It is most important that “promote its enjoyment by the community and visitors to the area” specifies “enjoyment of its special landscape qualities”
- After “proposals will be assessed on their individual merits, add, “as to whether they are consistent with conserving and enhancing the special landscape qualities.”.
- The text should note that potential AONB will be based on landscape assessment by Natural England on behalf of the Minister and may include land not currently designated as AGLV.
We suggest the monitoring indicator is inappropriate. It should track absence of major development (which is in principle harmful to the statutory purpose even when deemed in the public interest) not avoidance of appeals. The currently proposed indicator could encourage the perverse behaviour of avoiding appeals.

Object: seeking improvements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We welcome this policy and ask that reference is made to the recently increased climate change allowances required when considering flood risk. In view of these, the encouragement given to reducing flood risk on sites that include 'developed' flood zone 3b (functional floodplain) should be strengthened.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1: Presumption in favour of sustainable development

We appreciate that this is model wording. However, experience since this was first produced now shows that this wording is inadequate to communicate accurately to users of the Plan:

1) the concept of sustainable development including the five guiding principles

2) the policies in the NPPF as a vehicle for achieving sustainable development

3) the positive presumption in favour of sustainable development,

While fully appreciating that it is important the Local Plan does not duplicate the NPPF, the reasoned justification could usefully clarify the three components of policy S1.

Object: inadequate, unclear

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17352  Respondent: 15460737 / Donna Collinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“4.1.6 Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). “

Need to be clear that in Green Belt openness is the determinant. Hence, previously develop open land should not be preferred.

“4.1.8 Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. “

This policy sequence moves too readily to allocating green field sites and omits to encourage efficient use of previously allocated land or initiatives to assemble brownfield sites. This reflects weaknesses in the Council’s own approach until recently. There is a risk the policy as drafted will also encourage developers to turn too readily to greenfield sites rather than to engage in redevelopment initiatives.
There are errors in the development need identified and the harmful consequences of meeting need have not been weighed in an appropriate assessment.

“13,860 new homes,” The OAN on which this is based is exaggerated.

“4.1.10 This is a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes and employment floor space in line with the aims of NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development required by 2033.”

Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.

“4.1.12 Table 1 shows a number of new homes that is greater than the figure in the policy. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. Further details of these and other sites are provided in the site allocations policy of the Local Plan.”

It in inappropriate to designate more land than required given the constraints.

Monitoring Indicators

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.

Object: departures from Green Belt policy including purpose 5, housing figure based on inaccurate and flawed assessment of need

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1950  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GRA Comment: Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates housing need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

Strategic Housing Market Assessment

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS (see Appendix 1) has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year. It also advises the SHMA method should be changed to consider student housing need separately due to the distorting effect of students on the overall Objectively Assessed Need (OAN) forecast.
The current SHMA inflates the proposed housing figure due to

• failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability, and
• flaws in the method for estimating the number of homes needed to support job growth.

The SHMA needs to be revised, and the proposals based upon it reconsidered, before the Plan can be viewed as ready for submission to an Inspector. In addition, an immediate start should be made on calculating student requirements separately using a consultant with appropriate expertise. It is probable this exercise will reduce the OAN.

Revision of the SHMA to take account of the consequences of the vote to leave the European Union has been proposed by a number of consultees and the Council leader. The NMSS SHMA Review makes an important contribution to the way ahead in several respects by showing that:

• even with a relatively strong pre ‘Brexit uncertainty’ economy, and using a stronger trend period than the one used by GLHearn for migration flows within the UK, the GLHearn OAN figure was too high.
• simply making a few post ‘Brexit uncertainty’ adjustments to economic and demographic need, as currently calculated by GLHearn, would not be an adequate response because their approach to the economic data is flawed and they have not corrected for large errors in the historical data on international migration,
• student flows should be better understood and separated out to avoid distortion of the forecasts and, especially given the significance of flows of international students in Guildford, separate modelling of the student population will become more significant in future.

NMSS has advised that the new projections issued on 12 July 2016 should make little difference in Guildford as the household formation rates on which they are based are not significantly different from the 2012-based set.

It is most disappointing that demographic and economic model assumptions have been withheld by GLHearn so that the whole process cannot be cross checked. This means the OAN taken from their SHMA cannot be substantiated.

Green Belt and Countryside Study

This does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing instead in major settlements beyond the Green Belt.

• The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Eg It could be argued the sweep of open countryside rising up Gosden Hill, as you approach Guildford along the A3, is highly prized.
• Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.
• Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt as seen from surrounding AONB.

Transport Evidence

This has been produced very late and is incomplete and untested to the extent that the Plan is not ready for a Regulation 19 consultation.

• It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. We assume various inconsistencies are errors (eg 1000 homes on Slyfield generating no extra traffic). More information is needed to understand how much congestion will occur, and where. This has not been provided in time to inform Plan proposals or
responses. The analysis points out problems across the network and does not support the claim that the highways network can accommodate the additional demand arising from the Plan.

- The available evidence shows that the Sustainable Movement Corridor is in a preliminary stage of development. The information provided indicates that it cannot achieve its intended objectives along much of its route due to narrow roads and pinch points. The original concept has had to be diluted and impact on other routes, demand and an economic business case are required. The very concept of a single linear route as appropriate for Guildford is unproven.
- Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed.
- No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods.
- Information about the town centre as regards traffic, buses and parking is lacking in the Plan. The Plan does not address the traffic issues in the town centre. The Council has announced its intention of implementing the Town Centre Master Plan which includes making better use of the asset of the river. We submit that the Plan should include the protection of a route for a new bridge connecting the east and west parts of the town across the railway to maintain accessibility and to provide greater resilience in this key part of the road network.

For more detail refer to Appendix 2.

Please Note: Additional transport information has been requested which it was not possible for Guildford BC and Surrey CC to provide in time for this submission. A list of the relevant questions has been submitted. GRA wishes to reserve the right to follow up aspects of this submission where lack of transport information (data or model assumptions) or absence of clarification leads to gaps or errors in analysis and observations.

Guildford Retail and Leisure Study

This is an improvement but the credibility of the case for massively expanding retail space is undermined by trends in retailing and by the repeated failure to implement the North Street development. The economic value of the green and historic character of Guildford is not adequately considered.

Air Quality and Noise

NO2 emissions need careful monitoring in view of some sites being close to limits, revised estimates of premature deaths, issues with vehicle emission controls and misplaced optimism regarding congestion. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1951  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GRA Comment: The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

Green Belt

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation, notwithstanding that this is the time when any boundary review deemed necessary takes place. Any such review should be mindful of the “great importance”, “openness” and “permanence” of Green Belt and take a long term perspective towards this planning mechanism.

The Mayor of London intends to respect London’s Green Belt boundary.

The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure (eg “support delivery of A3 junction upgrades” or “facilitate delivery of new strategic infrastructure including a rail station, park and ride and a secondary school”) or to fully meet exaggerated need does not pass this test. Nor does building on open, previously-developed Green Belt.

Opportunities to channel development towards locations beyond the outer Green Belt boundary, linked to sustainable transport and the duty to cooperate, have not been adequately considered at a strategic level. This assessment should involve more than just looking at a small area of countryside within the borough immediately beyond the Green Belt boundary, or indeed the rather meaningless Housing Market Area.

In view of the extent of the Area of Outstanding Natural Beauty, Special Protection Area and Green Belt in Guildford Borough, which restrict the availability of land suitable for development, it is important that the potential for sustainable travel is considered. This needs to be balanced against the option of minimising distances between work and home which is usually treated as a more sustainable approach.

It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review without considering the bigger picture is not sustainable. Proposed erosion of Green Belt to development and “insetting” in this Plan should be put in the context of cumulative loss. Since the Metropolitan Green Belt was established, just over 6% has been lost (6.24%), noting that a modest proportion of Green Belt lost to “insetting” will be protected as open space in villages.

If there is a case for Green Belt development, this would need to have been proven through the application of policy. In addition, careful thought would need to be given to the pace at which Green Belt is developed using a long term reserve site approach. It would be unsustainable to release all potential last resort greenfield options within one plan period, denying future generations any such options.

The Green Belt and Countryside Topic Paper is cause for concern on the issue of Green Belt safeguarded for development. It suggests in paragraphs 4.64 to 4.71 that the Plan will not safeguard sites for future development because so little land can be identified and more strategic solutions will be required. It concludes that any further Green Belt development would result in ribbon development, a stretched urban area and merging of villages with the urban area*. In view of the fact that such ribbon development would be wholly unacceptable, the more strategic approach referred to in paragraph 4.70 is required now. The current Local Plan review should both constrain the overall scale of development in this Plan and also very carefully pace any releases deemed necessary over several generations.

*4.68 “Given the limited central ribbon within which development could potentially occur, safeguarded land in Guildford would result in an unsustainable pattern of development. It would create an oblong-shaped urban area...”
4.69 “there will inevitably be a limit to the extent that Guildford urban area can expand before it would begin to merge with surrounding villages. This would have a detrimental impact on the character of the countryside and our rural communities.”

4.70 “…a more strategic approach to growth or protection will need to be considered, in cooperation with our neighbours.”

**Sustainability Appraisal**

The extent to which the current Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report

- accepts the Council’s corporate objectives, which have not gone through proper consultation, as consistent with sustainable development when they are not,
- treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”,
- fails to consider options that constrain development or that make greater use of brownfield or previously-released greenfield land,
- focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect countryside around Woking
- does not consider environmental limits or impact on the next generation in terms of weighing demand for homes alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless:

- “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;
- or specific policies in this Framework indicate development should be restricted.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we do not consider it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective.

Notwithstanding that the Sustainability Appraisal should be proportionate, realistic, strategic, and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

We note that the Government’s Local Plans Expert Group has advised (March 2016) that “Whilst we recommend significant reductions in other elements of the local plan evidence base..., we propose that a proportionate Assessment of Environmental Capacity should be an important part of plan making.” The group confirms that “Objectively assessed needs for all types of development are the starting point but it is then necessary for the authority to consider the extent to which the plan can meet those needs consistently with the policies of the Framework.” They continue, “Despite the clear test set by paragraph 14 of the NPPF, few authorities compile an assessment of the environmental capacity of their area, making it difficult for Planning Inspectors to apply the NPPF policy”. They go on to say “We recognise that the NPPF does not require authorities to meet the full identified need for development in all circumstances, even within the Housing Market Area, if there is insufficient environmental capacity but we encountered significant uncertainty about how the appropriate balance should be struck. We make recommendations to remove that uncertainty and to confirm the legitimacy of applying the tests set out in the NPPF to ensure that needs are met up to the point where the adverse effects of doing so can be shown to outweigh the benefit of meeting the need.”

An adequate Sustainability Appraisal, which considers environmental capacity alongside social and economic aspects of sustainable development, should enable reasonable alternative scenarios to be tested against environmental capacity. We
suggest the alternative scenarios selected, ranging from fully meeting exaggerated need to also meeting all of Woking’s need that would be unmet due to the application of constraints, did not test a meaningful spectrum of options. Indeed, it seems bizarre to place such emphasis on developing Green Belt in Guildford to protect countryside in Woking.

The Expert Panel was concerned at the number of authorities that cannot demonstrate soundness because they have constrained development without adequately testing the point at which adverse effects of meeting need can be shown to outweigh the benefit of doing so. The concern is that Guildford has gone the other way: it has been so eager to get the Plan through that it has failed to give sufficient weight to harm to the environment from fully meeting need, such that it proposes an inadequately tested option that would constitute unsustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GRA Comment: It is unsound and unsustainable to develop on the scale proposed. The overall housing target (13,860 new homes) and 40% increase in retail space should be reduced to take account of the constraints of our gap town and growth in online retailing. Opportunities to provide greater accommodation on campus for university students, to provide more homes as part of the North Street development, to plan the river corridor achieving flood risk betterment, to promote sustainable commuting and to open up access across the railway for our physically divided town have not been considered positively.

We do not consider that the proposed housing target of 693 homes a year is soundly based, notwithstanding the intention that this should be skewed to later in the Plan period or the aspiration that this should be linked to timely delivery of infrastructure. We are also concerned that a target of “about 695” homes a year and a focus on strategic sites in the Green Belt were suggested very early in the Plan-making process and we would be concerned if the Plan had been prepared around these working assumptions.

Green Belt and Sustainability

The Council’s case set out in the Green Belt and Countryside Topic Paper paragraph 4.62, is as follows: “We consider that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83. Our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the
area, which would lead to unsustainable commuting patterns. Each addition or removal to the Green Belt is also separately considered above and in the Housing Delivery topic paper.”

We do not accept this assessment.

• The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
• We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
• Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a 40% increase in retail, have not been pursued.
• Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
• The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.
• Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
• It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
• High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

Constraints

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2033 to a number significantly below 13,860. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure is also a constraint. Current congestion is severe by any meaningful definition and there is a backlog of infrastructure investment. Assessment of the very late and incomplete transport evidence by expert, Richard Jarvis, using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. See extract below and Appendix 2. Any notion that building 13,860 homes is going to deliver infrastructure that will overcome Guildford’s traffic problems seems misguided.

“The cumulative effect of the additional traffic generated by the developments in the proposed submission local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF.’”
“The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the proposed submission local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic (47% more than in 2009), for which they are unsuitable. “

In view of the extent of physical constraints, protective designations and congestion, it is likely that even a more accurate, lower OAN housing target would need to be constrained.

We submit that Guildford BC should:

° revise the SHMA to make corrections and to better account for student need
° undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
° test the transport evidence that should inform the plan and which points to congestion.

Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.

If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking has proposed constraining its OAN by 50%.

In Guildford, if one uses a revised OAN of 10,200 over 20 years (510pa) and assumes no Green Belt development and that 50% of need can be met through positive initiatives in the town, this results in a target of 255 [check] homes pa which would be below the previous target of 322pa. This reinforces the extent to which Guildford is constrained. This would be broadly consistent with the urban capacity assessment undertaken for the last Surrey Structure Plan and with the concern about the risk of town cramming in Guildford identified in the SE Plan.

If one uses a revised OAN of 10,200 over 20 years (510pa) and assumes 20% of all last-resort Green Belt land is released to development in each of the next three Plan periods, this results in a target of 340pa [check] for the current 20 year Plan period.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. They cannot be left until the next Plan period as proposed.

**Neglected Opportunities**

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

- **Campus accommodation:**

  Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town. Significantly, this could deliver homes within the challenging first five year period of the Plan.

  There has been some late progress towards meeting the modest 60% student accommodation target agreed in the previous Plan as a result of residents expressing concern at the lack of progress in meeting the undertakings in the previous 2003
Plan. However, the opportunity to increase significantly the proportion of university students attracted to live on campus has not been pursued. Neither nostalgia by decision makers for student days spent living in shared houses in the town, nor eagerness by the University to support a case for development on Blackwell Farm, should deflect attention from the opportunity to free up homes in the town for use by others. Nor is it adequate to reject the possibility of increasing campus accommodation by saying the percentage is at the higher end compared with other tertiary institutions or to be sceptical about uptake and funding. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town.

Appendix 3 provides more information on the opportunity.

- **Flood risk:**

  Higher priority should be given to work on integrating flood risk management and development in the town centre. The 2014 Draft Local Plan failed to include a Flood Risk policy and was not informed by a flood risk sequential test or Level 2 Strategic Flood risk Assessment. Subsequent application of the necessary tests has resulted in some residential allocations being removed and some zone 3 non-residential allocation proposed under the exception test.

  Overall, progress has been painfully slow in planning positively along the river corridor in a way that achieves flood risk betterment and also enhances the natural and built environment. Time was lost with a first iteration Town Centre Master Plan that paid insufficient attention to the significant flood risk. The margin required for climate change reinforces the importance of factoring in flood risk and moving away from the old approach of seeking to justify development in even the functional zone 3 floodplain.

- **Sustainable commuting:**

  Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town. Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

  The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted in from Waverley than vice versa.

  In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

- **All-direction, central bus interchange:**

  Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency. A central interchange is needed in view of levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**

  Better progress, and a more joined up approach, in town centre planning is required. The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

  It is a problem that Guildford BC has chosen to tackle the town centre after the Plan via an Area Action Plan in which it intends to incorporate Scenario 2 from the A&M/Arup proposals that will reduce highway capacity in the centre. This prevents joined up planning. For example, the Plan should face up to implications of constraints being applied to roads such as the A281, A31 and A322.
• New cross-town road bridge:

An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided town. We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

Sustainable Choices

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

• Balance between retail expansion and town centre homes

The Plan should weigh the case for a 40% increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.

The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the High Street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered. Residents were dismayed that the Bellerby theatre site was used for yet another supermarket rather than primarily homes.

• Balance between high-value-added, knowledge-based economy and retail expansion

Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

Planning ahead

In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We welcome the approach adopted by local councils in Surrey of working together based on Memoranda of Understanding, although we note that neighbouring Waverley has not signed.

We are concerned that the Strategic Housing Market Area is not meaningful and omits nearby communities in Hampshire, such as Rushmoor, that are very important for planning housing, employment and transport in Guildford. Further, a strategic approach to Green Belt planning and commuting requires cooperation with more distant communities with transport and economic links. Aldershot, Frimley and Portsmouth are all relevant to Guildford.

Within the somewhat arbitrary Strategic Market Area, differences in approach have a distorting effect, as seen in Guildford’s Sustainability Appraisal.

Several large developments are proposed in neighbouring Plans that would have a very significant effect on Guildford and it is of concern that the impact of these has not been specifically addressed as part of Guildford’s Local Plan process.

There is no discussion in the transport papers about the traffic generated by Dunsfold or Cranleigh wanting to use Guildford’s roads. For example, the A281 is forecast to be far over capacity at Millbrook. Guildford BC is saying, in its views on the Town Centre Master Plan and the Transport Strategy, that it wants to opt for Scenario 2 which means a reduction of say 30% in capacity. So what will happen to traffic from Waverley that wants to go to the hospital or University? Will it try using the B3000? This does not appear to have been thought about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Guildford Residents Association (GRA) has

- engaged positively in the Local Plan process from the outset,
- agreed “Aspirations for Guildford” and Local Plan consultation responses with the support of 26 Residents Associations and four Parish Councils,
- encouraged and supported residents to participate in the Plan-making process
- through contributions from residents groups, raised funds to commission an expert to review the SHMA, and
- drawn on the knowledge of environmental, planning, engineering, flood risk management, economic, commercial and transport experts to inform its contributions.

GRA does not consider the Plan to be sound for the reasons set out and we wish to make the case for changes we consider necessary to achieve this. These concerns, which relate to the overall approach, manifest themselves in policy throughout the Plan. Hence, our interest is overarching rather than confined to specific issues.

We would like to participate in all matters at the inquiry on behalf of the many residents who have worked together to establish a collective voice through the GRA. We would also like to be accompanied by an expert witness for the SHMA and for transport-related matters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1955  **Respondent:** 15460737 / Donna Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Residents wish to register concern and disappointment at the poorly judged decision to produce, promote and spend public money on a film to represent the views of “some residents”. A number of those “residents” represent institutions that have interests in proposed development that were not declared. There was no attempt to achieve balance. The film was inconsistent with the fair approach proposed in the Statement of Community Engagement. Use of the video on the Local Plan homepage could bias the Regulation 19 consultation. The suggestion that housing proposed will make a material difference to affordability or that congestion will be solved by development is to be tested. Indeed, the traffic evidence was not available when the video was produced and some of the data needed to assess congestion is not yet available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Appendix C Infrastructure schedule

1. SRN1 and SRN 6 should be reinstated.
2. The addition of LRN 23, LRN24 and LRN25 is supported.
3. The funding sources for many of the Local Road Schemes have been changed to ‘Developer’ only. The highway authority, SCC, is not proposing any schemes of its own. Is this due to lack of funds, or a belief that nothing more is needed?

The addition of BT5 and BT6 is supported

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Chapter 2 Key facts about the borough

1. The changes to paras 2.13, 2.14a, 2.14b and 2.15 are welcome. In para 2.15, the text now says that there are opportunities improve the capacity of the road network, rather than performance. This is more realistic and fits with the plans. However it does not match the ambition of the Transport Strategy to ‘address the historic infrastructure deficit’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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28. Policy A26 Blackwell Farm

The addition of a six form entry secondary school will add to morning peak hour traffic demand on a road system that will be under pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy A35 Wisley airfield

The addition of point (4) under Requirements is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4317  **Respondent:** 15460737 / Donna Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A59 new rail station at Guildford West. The addition of this policy is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2695  **Respondent:** 15460737 / Donna Collinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are still fundamental flaws with the latest draft of the proposed Local Plan that need rectifying.

Members of Stoke next Guildford Residents Association, are so concerned about the local plan they contributed twice to the Guildford Residents Association fund to hire expert Neil McDonald.

Please find attached latest version of Neil McDonald’s report. It has a minor addition on pages 19 and 20 which advises ONS has said there is an issue. This further strengthens the case for revising the Guildford population change projections ie the demographic housing need.

Behind the scenes Neil has had his report peer reviewed and agreed in various quarters. You may like to be aware that the Waverley inspector accepted Neil’s demographic analysis as opposed to that of GL Hearn, which lends further weight to his Guildford analysis.

A report from the Protect Our Waverley campaign group on the Waverley Plan Inquiry is well worth a read. It is available on this link: [http://powcampaign.org/report-examination-public-27th-june-6th-july](http://powcampaign.org/report-examination-public-27th-june-6th-july)
From this link you will also see that GRA concern about Guildford being asked to meet Woking’s unmet need was borne out at the Waverley Inquiry. This increases the importance of applying constraints in Guildford prior to Plan submission (just as Woking did).

Stoke next Guildford RA located just south of Stoke Crossroads predominantly Josephs Road and north Stoke Rd is an area where residents suffer the worst air quality almost 29 times more polluted than anywhere in Guildford except the town centre traffic lights, a Surrey University study revealed in 2015.

This far exceeds EU safe limits!

Traffic pollution was recently placed in the top ten health risks faced by human beings globally, with the World Health Organisation linking air pollution to seven million premature deaths every year,” said lead author of the research, Dr Prashant Kumar, from the University of Surrey.

At the town centre stakeholder meeting briefings of 21.7.17 it was revealed the proposed Sustainable Movement Corridor and the LEP proposal has been watered down and will be incapable of delivering the modal shift and reduced congestion required. Also without an A3 tunnel which would have linked benefits for the entire Enterprise M3 area, ie not just Guildford, increased congestion would add further to air pollution in neighbouring areas, which already exceeds safe EU limits.

See attached report by GRA Transport expert, Richard Jarvis’s updated comments on the transport aspect of the Plan which support the case that transport infrastructure is a constraint even with all the proposed measures.

Stoke next Guildford RA most strongly urge the council to use all available constraints including transport infrastructure in the local plan for congestion fuelled air pollution reasons. Residents frequently cannot exit onto Stoke Rd as the congested traffic from the lights tails back to the Guildford College roundabout and Guildford is already euphemistically known as a car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA Final SV.pdf (1.2 MB)  
Local Plan GRA Last Chance Response Flyer 2017 sv.pdf (462 KB)
Comment ID: pslp171/2689  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

27. Policy ID3 Sustainable transport for new developments

The change from ‘will expect’ to ‘will be required’ in point (2) is supported. The similar revised wording in point (7) is also supported.

The lack of specificity about the Sustainable Movement Corridor makes it difficult to make an informed comment on point (3).

In para 4.6.28, the aim of achieving a modest modal shift is noted, and also that the road schemes in the plan will ‘mitigate the principal adverse material impacts of this growth in traffic volumes’. It is realistic to recognise that there will be congestion on the road network in peak periods. However, the problem is that better evidence is required of what conditions will be like both halfway through the plan period and in 2034. The risk of them being unsatisfactory (perhaps unacceptable) is significant. Point (11) is noted but it is not clear that any of the town centre sites included in the plan would involve additional off-street car parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/500  Respondent: 15460737 / Donna Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Q 1 The evidence base and submission documents

Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford borough PSLP: strategy and sites June 2017

1. This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC’s argument is that things will be better than estimated in 2016. We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the vicinity of the development. However, there are some sites where the planned development is now greater than in 2016. There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to
Waverley in response to that planning application. The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

2. On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place. Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

3. With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching.

4. Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure. The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site. The A31 is regarded as a key route by the LEP and LA partners.

5. The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are not suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob’s Well.

6. The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be ‘major’ in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.

7. The M25 is forecast to be at capacity after the planned improvements have been introduced, as shown both in the SHAR and also in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequencs for Ripley are likely to be serious. It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which is some recognition that there will be a problem.

8. A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. Section 1 Overview. The description of existing conditions and challenges is broadly correct and welcome.
2. Section 2 Surface access to airports. The problem is that the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected by the weaknesses listed in this section.
3. Section 3 Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured.
4. Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highs England set out in the Topic Paper: Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’ is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council (the highway authority). Under the strategy and the Plan, the issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be addressed until half way through the plan period.
5. Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway relieving pressure on the Farnham Road railway bridge should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.
6. The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough.
7. The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver and its potential impact on road capacity. A high quality bus station in the town centre is critical for the future of the town. There is a lack of park and ride on the east of the town and not even an aspiration for future provision.
8. The active modes strategy is welcome. However, many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists, and this has to be either accepted or addressed over the long term.
9. Section 6 Air quality. If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality will continue to be a concern.
10. Section 7 Road safety. The proposals are welcome, but as stated above, the schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.
11. Section 8 Programme and funding. See comments on Topic Paper: Transport and the Infrastructure Schedule (App C).

**Topic Paper: Transport**

1. This is a helpful paper providing context and background to the transport aspects of the Plan.
2. The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but it would have been better if the results had been available for this consultation.
3. It is recommended that the wider evidence base should be expanded to include the following:
   - Local Enterprise Partnerships and Local authorities: Influencing Strategic Transport in the South East, WSP, 2016
   - Surrey County Council: Response to Waverley borough Council on WA/15/2395 Dunsfold Park, Dec 2016
   - Guildford Borough Council: Guildford Town Centre Highway assessment –Town Centre Highway Layout Concept Testing, WSP, April 2016

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>pslp17q/501</th>
<th>Respondent: 15460737 / Donna Collinson</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Q3 Soundness</strong></td>
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<tr>
<td>1. In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Respondent: 15460769 / Jonathan Gasson</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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</table>
As a resident of Normandy I strongly appose the proposal within GBC the local plan to develop this site A46 for 1100 house and a new secondary school.

This area of land is greenbelt and looking at the local plan no circumstances what so ever have been identified to justify the release of the site of A46rom the Green belt.

The need fro a new school arising with the development and to support the local area has not been proven , local schools are not currently full. If the site is not allocated for housing the need for a school can not be justified .

The proposed development would completely destroy the rural nature of Normandy doubling the number of resident's and just create another extension of Guildford to the east and Aldershot to the west.

On road infrastructure alone this proposal is not sustainable with only C class roads surround the immediate boundary of the site . The local roads are at present traffic levels are extremely busy and congested at peak times , Any small incident or planned road works courses long tail backs of traffic on the main Guildford to Aldershot Road and the Pirbright Road ,especially if traffic is diverted off the hogs back through Wanborough and Normandy .The road surface is deteriorating up in many paces and this will only get worse with another 2000 plus cars using the local roads on a daily basis.

Normandy is rural area with important natural habit and is immediately adjacent to the Thames Basin Heaths SPA . Any develop will have asignificant effect on the SPA .With added visitor pressure . The case for the provision of SANGS sites has not as yet be proven for the protection of the SPA.

Brown field sites within the Borough should be used wisely for Housing rather than more retail outlets. surely the need for housing is the greater priority.

This proposal needs to be rejected now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the inclusion of this site within the plan for these reasons:

In my opinion the classification of the two roads that border site A46, Westward Lane and Glaziers Lane, are ill equipped to service a development of this size and the additional traffic. Westwood Lane reduces to a single lane carriageway underneath the railway bridge and Glaziers Lane, a lower classification road than the former is narrower with residential garden boundaries bordering the carriageway. It would seem that the plan hasn't considered a viable transport strategy to implement a development of this scale. As a resident who commutes daily to Walton-on-Thames, I am aware of the already significant traffic congestion within the village at peak times. These two roads are currently roads used to capacity as alternative routes to/from the A3 and as rat runs to/from the Hogs Back, especially when there is a travel incident in Guildford or on the A3 (which is frequent!).

If the development is considered based on the village being served by a railway station, then this service would be immediately be over-stretched. To double the size of the village would be to potentially double the amount of people using the transport links. Wanborough is a small station with a short platform. The railway station car park has only 8 spaces and there is no scope to provide more. It is surrounded by houses and a roofing business thus not making it conducive to expansion without further investment of developing the field North of the line. The current car park floods terribly whenever it rains and you need wellington boots to access the platforms. This coupled with the lack of parking spaces already forces commuters to park in Culls Road and The Paddocks, so where would additional users of the station park?

Normandy already suffers with low water pressure, how will the usage of another 1100 homes help this?

There is already a significant burden on our Doctors Surgery in Glaziers Lane. You can't currently obtain a bookable appointment for much less than 4 weeks in advance, therefore you are often forced to request an emergency appointment as your healthcare needs become more urgent in this time-frame. I do not see how an increase to the size of the village can improve this situation. Has there been any provision for further healthcare needs of the proposed additional community?

Historically, the land is agricultural. The Greenbelt is for everyone's benefit. There are Grade 2 listed properties backing onto this site and surely this is part of our heritage that we should be working to preserve. Guildford Borough Council is keen to showcase its history, however, this should not be exclusively retained in a museum or in the town centre. We should be proud to see it in our villages and secure its place in our future.

The light pollution of the proposed development would affect the view from the Surrey Hills and have a lasting effect on the ecology of Normandy - less than 5kms from the Thames Heath Basin's Special Protection Area, with many wildlife species that use it, as listed above.

The current plan treats Normandy and Flexford as two separate settlements for the purposes of the greenbelt, however, they are one and the same and gives false suggestion; for which I can only presume is beneficial to planning. I cannot see a logical reason for including this development in the draft plan, only for it to serve the council. Dealing with one developer on a scale such as this would ultimately incur less resource than managing many smaller ones. Is Normandy now to suffer for Guildford Borough Council's shortcomings for not providing adequate housing previously?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the proposed development of Sites A46 and A47 in the GBC Local Plan.

I am a resident of Normandy, of 27 The Paddocks.

**Site A47 Land East of The Paddocks: Homes C3 Quantity 50**

This site is on the direct boundary of my home and I strongly object to the inclusion of this site within the plan for these reason:

From first hand experience I see how easily this site floods. The fields are at saturation levels at all times, even during periods of dry weather. The ditches bordering the fields overflow during the winter and flood water creeps over fields creating large areas of still water; substantial enough for birds and wildlife to sustain new habitats in and the ponies that reside there in dryer months have to be moved to other paddocks. I believe the ground saturation levels would not be suitable for development. If built on where would the water drain to? Our garden floods in the wet weather already.

Amongst the various wildlife I’ve seen, is a pair of Egrets, which are rarely sighted away from Poole and Chichester Harbours. Bats roost nearby as every evening at dusk we see them fly from the direction of the field around our bungalow and back across the field. They continue this lap many times and my understanding is that they are protected by the Wildlife and Countryside Act (1981), which states it is an offence to intentionally disturb a roost. We also see Hedgehogs, Badgers, Common Toads, Barn Owls and Fieldfares. I am aware that both the Barn Owl and Fieldfare are protected by same legislation the Bat, however the Fieldfare is a migratory bird which arrives in its flocks to this site every Autumn is currently on the RSPB’s Red status list, as well. Any development to this site would not only disturb the fragile ecological status but would irrevocably destroy the fragile habitat of these species in our area.

There are also many mature Oak trees on site A47, one of which is a particular veteran and stands almost central to the site. Flexford borders the site of the Ancient Springs at Wanborough and the Area of Outstanding Natural Beauty on the Surrey Hills. It is less than 5kms away from the Thames Heath Basin’s Special Protection Area at Ash Ranges. The greenbelt is there to prevent the urban sprawl. Being located 3 miles out of Guildford it is vital to retain the boundary for social and ecological purposes. Previously this was ‘protected greenbelt’, so why has the status changed?

Furthermore, my husband and I chose to buy our home adjacent to this site over any other property we viewed purely because of its location and outlook from the kitchen and garden, not because of size or style or because it was up to a certain stand of living. We moved there 3 years ago and have sacrificed and purchase it. We have invested time and money to have a new boiler and central heating, new electrics and plumbing. The property isn’t large but it will take us many years to complete the renovations whilst there is general maintenance work to pay-out for. We are not seeking to extend. We consider this to be our forever home and would be devastated if we were to be surrounded on all sides by dwellings and our outlook was to change. It would destroy our sanctuary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp173/478</th>
<th>Respondent: 15460801 / Melanie Williams</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to support the removal of Site A46 from the GBC Local Plan due to:
• The change of the exceptional circumstances that were used in the previous plan to justify the development of this site.
• This land is Greenbelt land
• The minor roads that surround the site
• The demand that would be placed on our Doctors surgery

I wish to support the removal of Site A47 from the GBC Local Plan due to:
• The site continuing to meet the criteria of a Site of Nature & Conservation Interest (SNCI)
• The land is Greenbelt and should remain protected as per the above status for current and future generations
• To prevent settlement sprawl

I wish to object to the removal of greenbelt status of the:
• Homes in Guildford Road,
• Land at the Northern end of Glaziers Lane,
• Land in Flexford
• Walden Cottages
• Palm House Nurseries Traveler Site

I appeal to GBC to consider the environmental impact and improve existing infrastructure ahead of committing to future construction developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1905  Respondent: 15460961 / Liz Hampshire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the Local Plan.

As a teacher, I have a full-time job and so do not have the time or resources to respond to such a dense document. Where is the simplified version that ordinary people can understand?

It is not right that the plan prioritises development in green belt land when there is sufficient brownfield sites elsewhere in the Borough. Most people coming to the Borough wish to be close to urban centres, not stuck in rural dormitories, requiring smaller 2 or 3 bed accommodation, far more suited to an urban environment.
Also, in Horsley, the schools are full. Where are new families going to be educated? I would also point out that in and around Horsley, there is simply not the infrastructure to support the proposals, such as schools, transport, drainage, shops etc.

The proposal for Wisley Airfield will simply create a housing ghetto.

All in all, a shoddy, badly thought-out document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1907  Respondent: 15460993 / Mike Coussens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DRAFT LOCAL PLAN SITES A42, A43, A44 – PLEASE PASS LETTER TO INSPECTOR

I object as a Send resident to the number of new house builds being proposed in Send, Send Marsh and Burnt Common.

I object to the 7000 sq m of warehousing being included in A43. Burnt Common already has warehouse facilities.

I object to the amount of extra traffic and pollution these proposals will bring. The volume of traffic is already set to rise, regardless of many objections following the Councils permission for the building of Send Marina.

I object to the proposal of Send being removed from the Green Belt. The Green Belt is intended to be permanent and the local council and central government gave a clear election promise to protect the Green Belt and this plan reneges on that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1911  Respondent: 15461025 / Philip Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of evidence for the alleged housing need numbers in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1909  Respondent: 15461025 / Philip Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I would be grateful if you would show my objections to Guildford Borough Council's proposals relating to the development of Ripley and surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3794  Respondent: 15461025 / Philip Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the Garlicks Arch development on the grounds that the proposal for 400 new homes and an industrial site would lead to overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3795  Respondent: 15461025 / Philip Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed on/off ramp at Clandon as this will increase traffic problems in all surrounding villages and cause gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the lack of provision for adequate school places in the area and the problems that a huge housing site would create.

I object to the lack of provision for Doctors' Surgeries which are already overstretched.

I urge you to reconsider and moderate any plans you are proposing to be in keeping with existing amenities. Development should be of moderate density and industrial space should be at Slyfield if it is needed. Please do not cause infrastructure overload. Please confirm that you have received my communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the lack of provision for adequate school places in the area and the problems that a huge housing site would create.

I object to the lack of provision for Doctors' Surgeries which are already overstretched.

I urge you to reconsider and moderate any plans you are proposing to be in keeping with existing amenities. Development should be of moderate density and industrial space should be at Slyfield if it is needed. Please do not cause infrastructure overload. Please confirm that you have received my communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object on the ground that the development would lead to the erosion of the Green belt and any insetting of villages would set a precedent for developers to move in anywhere they choose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8091  Respondent: 15461025 / Philip Masters  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1179  Respondent: 15461025 / Philip Masters  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1912  Respondent: 15461153 / Lynda Masters  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objection to planning proposals for Ripley, Send and West Clandon

I would be grateful if you would show my objections to Guildford Borough Council’s proposals relating to the proposals for development at Clockbarn Nursery, Land at Garlick’s Arch, Burnt Common and land west of Winds Ridge.

I object to the removal of Send from the Green Belt. The Green Belt was intended to act as a permanent buffer from excessive noise, traffic and disturbance. Local Councillors and central government gave an election promise to protect the Green Belt and this promise must not be reneged upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3796  Respondent: 15461153 / Lynda Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of 400 homes and an industrial development at Garlick’s Arch on the grounds that the noise and extra traffic from an already busy A3 would have a detrimental effect on the surrounding villages and its residents. The A3 already suffers from gridlock at certain times of the week and if there should be an accident, of which there are many on the A3, the subsequent closure of the A3 leads to chaos on the surrounding roads causing tailbacks through West Clandon, Chilworth and Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3797  Respondent: 15461153 / Lynda Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development on the grounds that Garlick's Arch provides a buffer to residents against Noise and pollution and as it is covered in ancient woodland, should be conserved.

I object on the grounds that the busy A3 leads directly to the Royal Surrey Hospital and any gridlock, closures or delays on this busy road, could cause potential loss of life if ambulances are not able to get to the hospital.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I further object on the grounds that 400 homes on one site is excessive and will put further strain on hospital services, Medical Centres, schools and general services. Send, Ripley and Clandon are rural and should remain that way. Any development should be moderate to meet requirements and not excessive to line the pockets of greedy developers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed interchange with the A3 at Burnt Common. Noise and pollution levels are already excessive and would almost certainly worsen. This would fundamentally change the area in detrimental way.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the land west of Winds Ridge and Send Hill being developed as this is a new proposal and has not been consulted upon. There is a school in the area and Send Hill becomes very congested as it is. Visitors to the cemetery should be allowed to do so in peace and quiet and two travelers’ pitches in this area would be entirely inappropriate as there would be insufficient access to the site along a very narrow single track country road. The subsoil on the site also contains documented unsafe landfill waste registered at GBC.

I object to the proposed developments on the grounds that they are excessive, would generate hazardous and heavy traffic in the area and encroach on Green Belt land.

I urge you to reconsider and moderate any plans you are proposing to be in keeping with existing amenities. Development should be of moderate density and industrial space should be at Slyfield if it is needed. Please do not cause infrastructure overload. Please confirm that you have received my communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1914  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling, so there is no transparency to this evidence base. This is undemocratic as those affected by the plan are unable to ascertain its accuracy.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

Please ensure my comments are shown to the Planning Inspector, before he/she makes his decisions. I request confirmation that you have received this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3808  Respondent: 15461217 / S. Gilby  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the building of 45 houses at Clockbarn Nursery</td>
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<td>Tannery Lane is extremely narrow, with stretches of twisty single lane with passing places. The junction with Send Road is hazardous and cases delay to vehicles joining Send Road.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Respondent: 15461217 / S. Gilby</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the inclusion of the land for new on/off ramps at Burnt Common (</td>
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<td>The addition of north facing ramps to the A3 at Burnt Common would be a disaster for lo ai-/ communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the building of 40 houses and 2 travellers' pitches on Send Hill there is registered at GBC documented unsafe landfill waste in the subsoil of the proposed site. There is insufficient access due to the narrow road at the site. It would spoil an area of outstanding, beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8099  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The proposed development at Garlick's Arch (A43) will impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8096  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy Y. I1)

Because there are few buses, people living in the new development will need to use cars to get to work. They will either drive to work or to a station. In order to get to Woking station most will need to use the A247 through Send. The A247 is already heavily used. It turns sharply over the bridge across the Wey Canal into Broadmead, which is flood meadow land. At the end of Broadmead the A247 comes to a mini roundabout where it splits the traffic into Woking in two directions. Any blockage to the road, by delivery lorries, road works, traffic lights or the frequent accidents that occur, results already in paralysis of both roads into and out of Woking, and also to traffic through Send. The road is not designed to take the current volume of traffic, let alone the huge traffic increase which will result from the development. Drivers trying to avoid the jams find that the rural roads in this area are narrow, single lane for the most part, in poor condition and have no footpaths. More houses means more dangerous and unsustainable traffic.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8098  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development.

The Plan does not identify infrastructure improvements sufficient to support the huge development. Local services, school places, doctors, are already stretched. There will be need for huge sewerage, water and utility provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8097  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 would need to be improved to cope with the increased capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. The A3 & M25 are already at capacity during peak hours, with horrendous jams frequently occurring, and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to damage that will be done to local wildlife.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas. The site has an abundance of wildlife, some of which are Y-protected. The development of the site will result in the loss of habitat. I am not aware that any wildlife report has been conducted on the site. (Policy 14)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Ojections to Guildford Borough Proposed Submission Local Plan (June 2016) believe that the Guildford Borough Proposed Submission Local Plan (June 2016) is wrong in very any respects, and is poorly conceived, unsustainable, unworkable and, in many ways, unnecessary. I set out here my objections to specific policies and matters within the Plan.

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey.

The three Wards of Lovelace, Send and Clandon & Horsley are rural wards representing about 11% of the existing housing in the borough. The allocation of sites in the Plan will result in 36% of all new housing being in this area. The allocation strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1940  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change to Policy A42, Clockbarn Nursery in Tannery Lane. because it hugely increases house numbers, it will cause huge traffic problems, and it once again ignores the many previous objections made by concerned local people.

Guildford Borough Council are failing to defend the Green Belt, and failing to take note of the concerns of local people.

I call on GBC to listen to the concerns local residents are raising, act on their objections, and accordingly amend the Local Plan 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1935  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change to Policy A43 Land at Garlick’s Arch as it not only ignores previous objections to the number of proposed houses, but adds 6 Travelling Showpeople plots, for which there is no proven demand in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1939  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change to Policy A 58 Land at Burnt Common as it now has a minimum allocation of 7000 sq m of industrial or warehouse development. There is no need for this development in the middle of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/586  Respondent: 15461217 / S. Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change to Policy 2 Green Belt because it proposes taking Send Business Park out of Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15552  Respondent: 15461313 / Anna Price  Agent:
I am writing to formally object to the proposed number of houses to be built around Guildford and the surrounding greenbelt and countryside.

This objection is, primarily, based around the adverse effects on rural life and in particular, the health and wellbeing of those who live and work in the area. Such people will, undoubtedly, be impacted, negatively, in terms of the newly placed constraints on their space, privacy, access to amenities and their pace of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I hope that this letter of objection is viewed, not as a rant nor as a judgement but an opinion that is shared by all the other letters that reach you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I hope that this letter of objection is viewed, not as a rant nor as a judgement but an opinion that is shared by all the other letters that reach you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to GBC’s proposal to remove Green Belt protection from a number of villages in the Guildford area including my village Chilworth.

I find it astounding that it is even being considered. Focus should be on existing brown land areas around the Guildford area that are in need of improvement and are better placed to offer affordable housing and accessibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3809  Respondent: 15461377 / Elizabeth Evenden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy number A46 – the development between Westwood Lane and Glaziers Lane.

- The development is planned on green belt land and will involve losing valuable green belt, within a kilometer of the protected Hogs Back area. This land is essential to local wildlife’s ecosystem, and also to the quality of life and air experienced by local residents.

- The development will create additional traffic on roads which are already strained to their limit. Guildford Road is already heavily congested at certain times of the day and the addition of 1100 new homes is likely to bring in upwards of 1500 vehicles, each of which will add to this congestion.

- The railway bridge on Westwood Lane is unsuitable for these traffic volumes. It’s a single lane bridge and and the additional traffic is likely to create holdups at the bridge and therefore an increase in pollution for local residents.

- The addition of 1100 homes to the community already in place will more than double it in size. This will have a profound negative impact on the peace, quiet and quality of life for people within the immediate vicinity and will also impact on those of us living with the environs of the new development.

- Inadequate consultation. This development has not previously been mentioned in the Guildford Borough Local Plan drafts, and I do not believe there has been sufficient consultation with local people and businesses in order to assess the likely impact of the development.

I would ask that the Council, on consideration of these views, not proceed with the plans and instead look elsewhere to site these homes, if they are required. At the very least I request that the size and scale of the development be reduced to a level more fitting with the rural environment into which it is being placed.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1915</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3810</th>
<th>Respondent: 15461409 / Laura Sawyer</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century. I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/3811</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Therefore we should be focusing more on saving our green areas, protecting our ancient woodlands and reducing the amount of traffic that passes through our villages; not planning more building which in turn will create further need for more schools, roads and other facilities which are already in short supply.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am contacting you to inform you of my objection to the proposed destruction of the greenbelt. Areas are protected for good reason and those reasons are just as important now as they ever have been.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SQLP16/1180   | Respondent: | 15461409 / Laura Sawyer   | Agent: |
|-------------|----------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Question:   | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer:     | ( ) |

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/3822   | Respondent: | 15461473 / Graham Marsden   | Agent: |
|-------------|----------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A26 |
| Question:   | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer:     | ( ) |

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3826  Respondent: 15461537 / Isobel Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3827  Respondent: 15461569 / Manoy Partridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8125  Respondent: 15461601 / Nicholas Carter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing Policy H2 - Affordable Homes

I currently live with my parents. I would very much like to own my own home, preferably in the Horsleys, but the prospect of that happening in the foreseeable future is very unlikely.

Under Policy H2, 40% of all but the smallest development sites will be required to have affordable housing built on them. However, property prices for any new development will reflect the prices of the established property market of the area. Developers need to see a return on their investment. For the Horsleys this will mean that ‘affordable’ homes will not be affordable to those who need them most.

In the Local Plan nearly 400 houses are proposed to be built in West Horsley, which is excessive compared to the current layout and character of the village. They are also designated to be in the Green Belt (which I object to). This in itself would put a premium on houses in the new development as encroachment on to Green Belt has to be justified. Proposals to have higher housing densities than those for the rest of the village, to enable a percentage of ‘affordable’ homes to be achieved, seems self-defeating.

Affordable homes therefore need to be where they are most needed and economically viable. Far more can be built in an urban setting where mass and height are not as much of an issue as in rural areas. The Local Plan has proposed relatively small amounts of development for the Guildford urban area compared to the surrounding villages and it would appear that most of the available brownfield sites in the town have been put aside for business and retail use. With many more businesses opting for internet trade from small offices/homes, this seems a wasted opportunity to use valuable brownfield sites to address the affordable housing needs.

I therefore OBJECT to Policy H2. It needs to be revised so the provision of affordable housing meets the needs of those who need it most in areas where it is most useful and sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8126  Respondent: 15461601 / Nicholas Carter  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
In order to try and save money I have recently decided to cycle to work rather than use the car. A one-way trip is 50 minutes, which, realistically is not to everyone’s taste. Other than the obvious health benefits, it means I am not sitting in commuting car jams every day as I can find alternative cycle routes often away from the main flow of traffic.

However it has made me realise that the proposed large housing developments at Wisley Airfield, the Horsleys and also further up the A3 in Send and on the edge of Burpham (Guildford) will make cycling on the local roads even more difficult and dangerous than it is already. Most of our local roads are narrow and windy, unlit and with poor sight lines. Many of them have pinch points which means larger buses and HGVs have to go over the centre white line or up onto the pavement. Cycling is for the brave on these roads and the large volume of additional traffic likely to come with the proposed developments will not convince people to take it up in preference to their car. The Wisley Airfield proposal is suggesting that cycling along narrow country lanes is to be encouraged to get to rail stations some 3 miles away. I think this is highly unlikely.

I OBJECT to Policy I3 as I feel it doesn’t consider accurately enough the consequences of excessive housing developments on our local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1931  Respondent: 15461633 / Anna Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1930  Respondent: 15461633 / Anna Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3829</th>
<th>Respondent: 15461633 / Anna Wood</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3831</th>
<th>Respondent: 15461633 / Anna Wood</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5).

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3828  Respondent: 15461633 / Anna Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8132  Respondent: 15461633 / Anna Wood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to the lack of proper infrastructure planning for sites (Policy I1)**

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/8139</th>
<th>Respondent:</th>
<th>15461633 / Anna Wood</th>
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<tr>
<td><strong>I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)</strong></td>
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<tr>
<td>Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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</table>
I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8128</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8129</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8127  Respondent: 15461633 / Anna Wood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8131  Respondent: 15461633 / Anna Wood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3834  Respondent: 15461665 / Andrew Earle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With respect to Policy A44. 19a Land West Of Winds Ridge and Send Hill:

1. I Object to the proposal in the local plan on the grounds that Send is in Green Belt and should remain so forever.

2. I Object to the proposal in the local plan on the grounds that the land has been identified as an old landfill site with potential contamination from industrial activities. Development of this site would disturb unknown contaminants exposing residents and workers to unknown and necessary health risks.

3. I Object to the proposal in the local plan on the grounds that the road can not take the increased traffic flow, both for construction and for additional residents. Send Hill is a narrow road where ANY on street parking introduces unacceptable risks. The proposed development is also near the narrower end with single track blind corners and a high risk T-junction with Potters Lane.

4. I Object to the proposal in the local plan on the grounds that it will severely impact the adjacent nature reserve.

5. I Object to the proposal in the local plan on the grounds that the open land and space would be lost. Current pathways would loose the feel of open countryside negatively impacting residents and visitors who frequent the local footpaths.

6. I Object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research was reportedly undertaken by Mill Field Services in June/July 2012 when the company was dissolved in January 2011. Travellers pitches are quite simply not desired or supported by residents.

7. I Object to the proposal in the local plan on the grounds that the open feel of the road and area will be unacceptably reduced. A recent planning application to build two houses in place of one was refused for this very reason. So how is building an additional 40 houses now acceptable? In short - it is not.

8. I Object to the proposal in the local plan on the grounds that the high level of disruption, noise pollution and air pollution for local residents of such a large construction project is unnecessary and unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8140  **Respondent:** 15461665 / Andrew Earle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I Object to the removal of Send Village from the Green Belt. Green Belt status is by definition a permanent status to protect open green spaces from development ensuring they are not eroded and therefore available for future generations to enjoy. It is NOT the Councils job to attack these spaces by downgrading them on a whim. The Council should take pride in protecting them by upholding the permanent Green Belt status. There are NO special circumstances to justify the removal of Green Belt status. Period. There are many brown field development options and existing passed planning applications that have not been utilised. These should all be fully utilised to meet the need for new housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID:</th>
<th>PSLPP16/8141  Respondent: 15461665 / Andrew Earle  Agent:</th>
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<td>Document:</td>
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I Object to the proposal to build 13,860 new homes. This figure is loosely based on flawed pre-Brexit data. Concerns on the data used have been raised since 2014, but the Council have failed to seek for improved data or release details on the model. Justification for this high amount of additional homes is week and unsubstantiated. Councillors repeated requests for debate on this has been ignored. Surrounding areas of the county have a much lower target for new homes. Clearly Guildford Council has made some compounded errors in its new home requirement calculation for the area and need to start again in an open, transparent and cooperative way. This should result in a realistic and much lower post-Brexit figure that can be met without resorting to any loss of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPA16/1936  Respondent: 15461761 / K.J. Pullen  Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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Re: proposed developments in Send and a new interchange onto the A3

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford and I particularly to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances. In fact that area of Green Belt is meant to be permanent and not continually eroded.

I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

I object most strongly to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. This would be disastrous for Send and the A247 would be gridlocked all day; just please visit this area during any of the rush hours to understand the significant weight of traffic that already uses the A247 and the minor surrounding roads. The knock on effect up to the small roundabout at Old Woking (where the B382 joins it) will be a really serious problem.

In fact I object to all the proposed sites in Send because, not least because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. We were promised there would be no major changes made to the 2016 draft plan by the Leader of the Council.

I object to the development at Garlick's Arch for 400 houses, which was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation. This has been quite disgraceful. Also this proposed development is simply not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick's Arch because the site has particular conservation sensitivity since it is covered in ancient woodland. Trees which have existed since the 16th century would be endangered. The site is attractive open countryside and part of the permanent Green Belt, with is protected under the National Policy Framework. It also represents an unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging towns and settlements. Oh yes, and the site is also subject to flooding!

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bandy to take any more traffic. It is a country LANE. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travelers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope. The local school cannot take any more pupils. The local doctors' surgery cannot take any more patients.

I vehemently object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I ask that you please take note of the deep concerns of a huge number of Send residents and indeed many others who are connected to the village, pass through it on a daily basis and use this area for recreational purposes.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/155  Respondent: 15461761 / K.J. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I notice that Send Business Park has been taken out of the Green Belt in total. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is a very restricted vehicular access the length of Tannery Lane in both directions, further development/expansion here detracts from the openness of the Green Belt. It is out of place. In my opinion the proposals to build on the Green Belt in Send are completely unacceptable. The GBC have not listened to the views of locals' objections and points of view, but are set on making life very uncomfortable for all of us. The proposals are inadequate for the infrastructure (as required by law, for schools, medical facilities, etc) and the already crowded roads. Plus this is notwithstanding the planned decimation of ancient woodland and our beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1578  Respondent: 15461761 / K.J. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note that the changes you have made actually increase the number of homes from 45 to 60, a 33% rise which is too much. This ignores all the hundreds of previous objections made by people. I cannot understand why you have done this. The access and traffic problems that already exist in Tannery Lane and the A247 junction will get worse. Erosion of the Green Belt in our village will become worse with the surface water flooding, which is already a serious problem. The countryside views from the River Wey Navigation that are enjoyed by so many will be spoiled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp172/1579  Respondent: 15461761 / K.J. Pullen  Agent:</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>It appears from the changes you have made to the proposal for homes and Travellers plots that you have totally ignored the numerous pervious objections which were made by local people. Exactly what are the 'exceptional circumstances' that you claim exist? A clear definition of these would be helpful, please? Six Travellers plots is excessive as there is no proven demand for any whatsoever in this locality. Garlick's arch is a permanent piece of ancient woodland from the 16th century. Apart from the loss of this unique area of woodland and the fact that Ripley and Send will effectively be joined and therefore defeat the key purpose of the Green Belt, this area is subject to frequent flooding and has been given a 'Flood Zone 2' designation.</td>
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<td>This revised plan for 400 homes will cause an immense over-development of our village and the removal of a flood plain. Will our doctors surgeries be able to cope with the demand from the proposed number of new residents or the local schools be able to offer places for children. Very importantly, would the roads be able to cater with the additional traffic, which would be excessive. Your changed plans would cause heavy traffic for many hours each day and queues that would stretch from 'Old Woking' to the M25. You must be aware of the current state of affairs of near gridlock on all roads in the area at least twice daily.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>This policy was deleted from the 2014 draft, because of the number of objections and it is noted that since then you not only reinstated the plan in 2016, despite a turn down in demand for industrial land and you have replaced the word 'maximum' with 'minimum'?? The '2017 Employment Land Need Assessment' shows a reduction in demand to 3.9 hectares for industrial land for the whole borough. The industrial and warehouse areas at 'Slyfield' and 'Guildford' have empty sites and industrial units, so your enormous over allocation of 10 hectares at Send, in the green Belt is unfathomable. Once again the impact on local roads will cause one mass of clogged carriageways and overdevelopment will completely defeat the purpose of the 'Green Belt'.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible terms to the expansion of Guildford as represented by this local plan.

I object to development within the green belt and in sight of the area of outstanding beauty.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worplesdon and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC's landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment)

Transport survey for A26 Blackwell Farm.

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

• The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
• The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
• The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital.
• All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (eg Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

The full consequences of the proposed local plan are enormous and are only now emerging. For example, even if all the proposed highway improvements in the Plan were built, congestion would not improve. We would just have a lot more people stuck in traffic and traffic would get a very great deal worse to start with. In our area, Stoke next Guildford changes we would be likely to experience include:

° the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern
more traffic from the major development sites coming in on the Stoke Intersection and London Roads

roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development

pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this.

Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1997  Respondent: 15461793 / Paul Smith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2002  Respondent: 15461793 / Paul Smith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is concern about the inability of current infrastructure to meet current and future needs. The policy recognises that the “Infrastructure provider” will maintain infrastructure in more cases, and developers can only offer a contribution via Community Infrastructure Levy. Until the current infrastructure can meet existing needs adequately, further development should be very targeted to meet only absolute essentials.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
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<tr>
<td><strong>Document:</strong></td>
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**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

The policy relating to AONB weakens the protections offered and (unlike previously) does not have restrictions on non-major developments. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now developments in the AONB seem to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing developments will be in the countryside, of which 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The housing target proposed of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford’s overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am sickened by the expansion of Guildford as represented by this local plan, and am objecting.

I object to development within the green belt and In sight of the AONB.

I object to the proposed development at site A26 Blackwell farm where an independent landscape evaluation study (funded by Compton, Worplesdon and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC's landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment).
Transport survey for A26 Blackwell Farm.

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

- The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
- The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital
- All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (eg Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

The full consequences of the proposed local plan are enormous and are only now emerging. For example, even if all the proposed highway improvements in the Plan were built, congestion would not improve. We would just have a lot more people stuck in traffic and traffic would get a very great deal worse to start with. In our area, Stoke next Guildford changes we would be likely to experience include:

- the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern
- more traffic from the major development sites coming in on the Stoke Intersection and London Roads
- roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development
- pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this. Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

Please do not let this local plan go ahead in its present from.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: pslp171/1467</th>
<th>Respondent: 15461889 / Jasper Collinson-Warr</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

I also object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential. Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]. Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a] adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: pslp171/1464</th>
<th>Respondent: 15461889 / Jasper Collinson-Warr</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID:  pslp171/1468  Respondent:  15461889 / Jasper Collinson-Warr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51 a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date. Three major strategic sites - Blackwell Farm, Wisley Airfield and Gosden Hill Fann- are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID:  pslp171/1461  Respondent:  15461889 / Jasper Collinson-Warr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3848  Respondent: 15461921 / Hazel Econs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of
pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing in response to the Guildford Borough Proposed Submission Local Plan: strategy and sites, June 2016. I object to the above plan.

I am a West Horsley resident, and have been my whole life. I am very concerned about the proposals. My parents moved here for the community life, and I fear that this lifestyle will be lost if the plans are approved, as the number of residences proposed will significantly change the character of West Horsley as a village.

The sites proposed in West Horsley are currently within established Green Belt. The policy on protection for the Green Belt is contained in section 9 of the National Planning Policy Framework, which sets out the fundamental aim of Green Belt policy. Policy on development in Metropolitan Green Belt is set out in paragraphs 79 – 92 of the NPPF. Inappropriate development is, by definition, harmful to Green Belt and the NPPF states that it 'should not be approved except in very special circumstances'. No 'special circumstances' have yet been explained or detailed.

Local planning authorities are advised to 'regard the construction of new buildings as inappropriate in Green Belt'. The Framework also states that a Green Belt review should only happen in 'exceptional circumstances'. This concept is further elaborated as being 'for example when planning for larger scale development such as new settlements or major urban extensions'. The Green Belt in Surrey is established with detailed boundaries; therefore 'exceptional circumstances' must be demonstrated to necessitate the change to its boundaries. Again, no 'exceptional circumstances' have yet been explained.

There are identified Brownfield sites in the borough which have not been seriously considered in the borough plan.

Policy P2 of the Guildford Plan states that Guildford Borough Council 'will continue to protect Metropolitan Green Belt against inappropriate development.' The expansion of West Horsley village is unsustainable for a few reasons.

The only entry to West Horsley from the A246 is The Street, which is narrow in places, and not in the best condition. The road surface would only get worse with increased traffic flow. It can be difficult to fit wider vehicles down certain parts of the road, and the necessity for more large vehicles to travel down it (increased bus services to serve more residents; more lorries carrying supplies to build houses) would not improve the situation.

Additionally, the roundabout connecting the A246 to The Street is very busy during school drop off and pick-up times, as Cranmore School is just off the roundabout. With increased volumes of traffic, the back up would only worsen, increasing journey times, not only for West Horsley residents, but for people trying to get from Guildford to Leatherhead and vice versa.

In West Horsley, there is only one small shop and no post office, and there is no where to expand the amenities to serve a larger population. East Horsley has many more shops which have always been well-used, but there are only limited parking spaces. Station Parade is populated by locally-owned and run businesses and these businesses could lose valuable custom if people cannot park close by.

Horsley railway station has always been a very busy station. The car park is usually full on week days. Unless it is expanded it will not support such a large increase in vehicles - at an exhibition about the proposed development of Wisley airfield, it was explained that there were no plans to expand it. There would also be increased traffic to & from the station to drop off & pick-up travellers including students going to schools in Guildford and Leatherhead.

The Medical Centre in East Horsley supports residents of both East and West Horsley, and it is currently at capacity - it cannot support the new patients that will move to the area should these plans go ahead. As well as extending the building (for which there is no space), more doctors would be required to care for residents.

In short, improving the village's infrastructure needs to be seriously considered before the building of more houses can be considered.

I support development - especially affordable and smaller houses, as I hope to one day be able to by a house of my own - but I do not support it at the cost of the community life I have been lucky enough to grow up in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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9. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.
6. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

12. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq. m proposed. That site was removed from the Plan without any reasoning.

The development at Garlick’s Arch would result in the loss of four existing rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The development of ramps at Burnt Common would mean that a far greater number of cars would access the villages from London/M25 to Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality. There would be permanent damage to the character of the Ancient Woodland on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

At present the rural roads which service Ripley, Send & Clandon are narrow are in poor condition and have no footpath access. If developed with 5000 new homes, serious congestion would be incurred making the roads unsustainable for traffic.

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

Decisions you make will permanently affect the area. It is our responsibility to protect and maintain areas for future generations; our children’s children etc. not just to line the pockets of developers.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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11. I object to poor air quality concerns (Policy I3)

As mentioned earlier the huge developments being proposed will lead to congestion and increasing levels of pollution. This would have a detrimental effect on local resident’s health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. I object to not protecting the Green Belt (Policy P2)

The removal of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) will result in serious urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8181  Respondent: 15462017 / Kevin Rhoades  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) has flooded many times in recent years and it would be foolish to ignore the warnings published by the Environment Agency as being in a higher risk than the Council’s own assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8178  Respondent: 15462017 / Kevin Rhoades  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The damage to local communities of Ripley, Send & Clandon that development of 13,860 new houses proposed is serious. Local communities do not need these houses and the Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8182  **Respondent:** 15462017 / Kevin Rhoades  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the Borough Wide Strategy (Policy S2)

The 13,860 new houses proposal by GBC without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. 5,036 houses are proposed Between the M25 and Burpham (about 5 miles) 5036 houses are proposed. This will lead to a merging urbanisation of identities the villages.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7024  **Respondent:** 15462049 / Harry Fish  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

Page 1535 of 2543
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1947</th>
<th>Respondent: 15462081 / Tina Wyatt</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Guildford Plan Proposals and Strategy site: June 2016

This small village's amenities only just cope with the residents it has. There are two small schools here, with very limited parking as it is. On rush hour morning traffic can tail back from Ripley Village High Street up to the Ockham motorway slip road.

The flooding would be of much greater risk too. As the proposals for three detached dwellings: R14/P/00012 on 27 February 20014 was refused.

Such a high density development would put a big strain on local services and parking, swamping our village changing its whole character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/1949</th>
<th>Respondent: 15462113 / Dorothy Ballentine</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a regular visitor to the Borough, I wish to submit my objections to the Local Plan.

My daughter and family live in the area, having moved to be nearer my son-in-law’s family who have lived there since the 40s. I have been visiting Horsley since the 90s and during this time the village has expanded immeasurably. The proposed development within the local plan would not change the Horsleys and the local villages for the better. I object to the proposed housing development as it is not sustainable and will have an adverse effect on the surrounding communities, on East and West Horsley in particular. I object to the 35% increase in housing proposed in West Horsley: such a level of development would change the village forever and would simply not fit in with the character of the village and the current density of housing. Horsley simply cannot absorb this scale of development.

Traffic in the village has become a real issue in recent years and any significant developments in the area would be unacceptable and incur unsustainable pressure on roads and infrastructures. I have grandchildren in the village who can no longer ride their bikes on the roads for fear of a serious accident. The roads are simply not wide enough to accommodate the current traffic, and further congestion would be a disaster. I object to the local plan to build nearly 14,000 new homes in the borough as the additional traffic and congestion would be an accident waiting to happen, not to mention its adverse effect on air quality, which is already poor.

My experience of the local medical provision and schools indicates that little capacity is currently available and the proposed development would put increased pressure on already buckling health and education systems. With regards to education in particular, the local Raleigh School has waiting lists in every year group and as such could not accommodate additional children. The site has no room for expansion and yet plans for a new school are not indicated within the local plan.

I also strongly object to allowing development on green belt land. Green belt exists for reasons drawn up by UK law, including restricting urban sprawl, preserving the boundaries of neighbouring villages, safeguarding the countryside and preserving historic towns and villages like Horsley. Environmental issues are real and we must consider the long term impact of reckless building on precious green belt areas. All the development in Horsley will be on green belt land. How can this be a balanced plan?

Finally my understanding is that there needs to be an identified need for the level of housing, but a total of 14,000 houses planned over a 15 year timeframe during the period 2016-2031, is flawed and as yet not explained. The cited figure of a 35% increase in housing in West Horsley, much higher than in other areas, is not sustainable and must be revised.

As it currently stands, I object to the local plan for the reasons cited above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the proposals for site A26 (Blackwell Farm). For the following reasons:-

1. An independent landscape evaluation study for Blackwell Farm has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). This is being ignored in the local plan.
2. The effect of the proposed development on the surrounding areas.
   - The road infrastructure has not been considered properly. The costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) cannot justify a development of this size. The scheme would therefore be economically unviable.
   - The new 4-way junction proposed at Down Place on the A31 would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
   - The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital. No consideration has been given for the effects of this on the surrounding area and the villages to the west of the site.
   - All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (for example Puttenham Interchange).
   - No consideration has been given for the effect of this development along with others at flexford/Normandy, Ash/Tongham and the aldershot area on the existing congestion along the A31/A3 with traffic approaching from the west.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels—roads, doctors, schools will not be able to cope;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8192  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object to building on the Green Belt. The essential characteristic of Green Belt is its openness and permanence: moreover this Government featured in its manifesto full protection of Green Belt as a core undertaking.

I object to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All Green Belt sites meet the five purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8206  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object that housing on the Green Belt will significantly increase traffic (already at saturation point) bringing increased danger, pollution and slower journey times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Over 20,000 responses objected to the 2014 draft Plan. Given that this new plan does not materially deviate from the earlier example I object that this Plan does not address my core concerns in any way. It can be best described as moving the deckchairs around on the SS Titanic and to no positive effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the scale of new building throughout the borough which is both disproportionate and unjustified;

I consider the calculation of housing need is unsubstantiated. The model has not been scrutinised and some fundamental assumptions are flawed. The housing target is unconstrained;

I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion which means that Green belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all other sights in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s AJI are out of proportion to the surrounding area and none qualify to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8205  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that new sites have been proposed in this consultation which have not been previously considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8209  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would conclude by saying that were the recommendations to be implemented, if only in a partial sense, it would mark the end of village life as such in a cultural sense and environmental quality. In other words our quality of life would suffer and no government of whatever colour has the mandate to unilaterally impose that on sections of the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8201  Respondent: 15462273 / Frank Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
The infrastructure of the surrounding area could not cope properly with the increased population and congestion the plans would cause and as a result I personally reject these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8200  Respondent: 15462273 / Frank Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I also take issue with building on the greenbelt and creating an overcrowded, unpleasant town out of the Horsleys - currently fantastic, safe places to live and raise a family.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8211  Respondent: 15462305 / Wendy Upham  Agent:
<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>It is quite appalling, the suggestion for literally destroying a beautiful village, it is downright wicked.</td>
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<tr>
<td>I am, as I have written several times totally against it, how many time do we all have to write before someone will listen. I have lived here well over 50 years and seen many changes- not all good.</td>
</tr>
<tr>
<td>LEAVE US ALONE I BEG YOU. THE GREEN BELT SHOULD NEVER BE TAMPERED WITH.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>60% of students should have accommodation on campus to reduce the pressure on housing needs.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
Contrary to advice from Ministers in the Department of Communities and Local Affairs the Local Plan proposes large scale
development in Green Belt. Not enough use of Brown Field sites.

Preservation of our Green Belt for future generations should be of primary importance, once lost it will never be recovered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8208  **Respondent:** 15462337 / Shirley Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

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Guildford is a gap town but constraints to the overall housing target have not been applied

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8207  **Respondent:** 15462337 / Shirley Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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As a resident of Merrow for 35 years i would like to support , without reiterating, the comments of Merrow Residents
Association committee concerning the Local Plan. As our council I feel it is incumbent upon you to preserve everything
that is so precious about Guildford, namely its historical value, its architectural beauty, its wonderful views and easy
access to Green Belt, all the things which make it such an attractive place to live, work and visit.

GRA report suggests 693 new homes per year is unnecessarily high and the evidence for such a high number seems
flawed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3874  **Respondent:** 15462401 / Anthony Hughes  **Agent:**

---
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/1951  Respondent: 15462433 / Lesley Keable  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed submission local plan: strategies and sites June 2016. As a long term resident of West Horsley I am concerned about the impact on this village.

I understand the National Planning and Policy requires that new development must make due allowance for the character and density of housing in the proposed area and be suitably supported by infrastructure and local facilities. The scale of the plans for West Horsley make it a wholly unsuitable site for the scale of the proposed development, being a 35% increase in the number of houses.

West Horsley is unsuitable as it is

- a village of character and history, which would be irretrievably damaged by very large scale development on the scale proposed
- it is set amidst Green Belt land, large areas of which would be lost or affected, with currently a low density of housing whereas the proposed development areas would be of much higher density.

- the local roads are often largely rural in nature - often narrow, poorly maintained and with no footpaths in many areas. They already struggle to cope with the current traffic let alone a very substantial increase.

- the other infrastructure I and my family use or have used is already running at capacity whether it be the primary and secondary schools both of which are beyond their capacity (the Howard having being refused recent planning permission to build a larger school opposite the current one) the doctors surgery, the sports clubs, the station and the shopping facilities where parking is a problem now etc

I also object that the scale of the proposed new housing at a 35% increase on the existing village appears to be so out of line with the proposals for other areas. Why select West Horsley for such an increase particularly when it's village infrastructure is so ill equipped to support it and it is self evidently harmful to precious Green Belt land? What exceptional reasons can be advanced for the destruction of this high quality Green Belt land?

I am not aware of the reasons why nearly 14,000 new homes are required in the area, or how this number has been arrived at. Whilst accepting that nationally new homes need to be built and this area of Surrey needs to take its share the scale of the local plans is simply not sustainable, and in an age where government funding is scarce, probably the more so post Brexit, it is impossible to imagine the necessary supporting infrastructural funding will be found.

For all the above reasons, and the many more that will be advanced by more informed residents and local bodies more familiar with the national and local planning regulations, I oppose and reject the local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1956  **Respondent:** 15462497 / Liberty Lawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The SHMA, a source of figures have been used in the development of the local plan have been proven inaccurate, and hence, the SHMA (and therefore the expected need of housing stock needs to be revisited. Additionally with the effect of the UK’s decision to leave the EU and the expected decrease in immigration this will bring has not been included in the SHMA or therefore the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1954  **Respondent:** 15462497 / Liberty Lawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to respond to the GBC Local Plan 2016
I am 17 and have been living in Normandy for most of my life.
I love it here and really don’t want our village to double in size.
The idea of having a secondary school seems unnecessary as I managed to get to Ash Manor ok and am now going to Farnborough 6th form
The thought of having more cars on the already busy roads seems madness to me.
I am just learning to drive and the roads couldn’t cope with hundreds more.
I love Normandy and Flexford because its green and open.
So I object to the Local Plan as its proposes twice as many houses in this village for no obvious reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3879  Respondent: 15462529 / Andrew Baxter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC Local Plan affecting Normandy
I object to the development proposed for Normandy for the following reasons:

1. the land is designated greenbelt and the proposed development of 1100 houses is out of proportion to the existing village;
2. there is no demonstrated need for school provision, and therefore this cannot be used as justification for new housing;
3. the existing road network is already stretched and full at times, and has no capacity to absorb the large additional demand the development would produce.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3883  Respondent: 15462561 / D B Houghton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference the proposed building on the site opposite Winds Reach in Send I would like to express my opposition to this on the following grounds

1) As you know this is an old rubbish tip and as far as I know no one knows what is there however we do know that whatever it was needs vents

As point of interest I have not seen any ground based insects since we got here some 14 years ago!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8249  Respondent: 15462657 / Alex Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION

I don't want East Horsley or West Horsley to be taken out of the Green Belt. I like the green fields and trees. I don't want the village to be more crowded or have more traffic jams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1962  Respondent: 15462689 / Clive Lawton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt: I was absolutely appalled to read that you would contemplate taking the villages of Send & Ripley out of the green belt. We voted for a Conservative Council to protect our rights. The very mention of losing the green belt status in our little village is a betrayal of what we thought you stood for and I strongly object to this proposal.

Apart from destroying the very reason I moved into Send 29 years ago to be in a quiet village environment, there is currently green belt land at the end of Send Hill that was divided into hundreds of plots and sold off to individuals on the premise that one day it may lose its green belt status. If the green belt were to be removed the flood gates would be opened to wipe out our village life and destroy our community.

Send Hill New Housing A44.1.9 ha: 40 x houses and 2 x traveler pitches on Send Hill, which is known as highly desirable prime semi rural and much sought after location, is the most unbelievable part of the plan. It is a dangerous road at the best of times with the road at the end where you propose building housing narrowing to a single track with a lethal blind corner. Also it would increase traffic to an unacceptable level. This was also a dump and I believe has methane gas rising from the land. I strongly object.

Where to build: If you need to build new properties, place them next to the A3 or similar position (not on the green belt). I wish when I bought my first property I was able to afford such a beautiful quiet area. Instead my view was overlooking the M3 at Sunbury. People should be grateful for a roof over their head albeit not in a prime location like Send Hill that I spent many many years working hard to afford.

Infrastructure: Having hundreds of new homes without the infrastructure in place is exactly the problem we had with free movement in the EU. Why do Councils and Governments keep squeezing a gallon into a pint pot, it doesn't work. Why are there no entries in your plan to expand the Doctors surgery where it's currently not easy to get an appointment, or our school. I suppose we will worry about that later, just like the NHS!! Invest in infrastructure before you expand populated areas, and do not increase them by 25% of their existing population.

Lastly, the properties you are proposing would have an immediate impact on our house values, so compensation would be sought should the plan go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1959  Respondent: 15462721 / Michael Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to please register my objections to the proposal to remove the Horsleys from the Green Belt for the following reasons:

- The 'exceptional circumstances' required before taking this decision have not been demonstrated.
- No sound reasons have been given for the proposed changes, in particular the local infrastructure is overloaded - for instance the local football club is full and hence children have to travel elsewhere to play football. Similarly, medical services and car parks are operating at capacity.
- The potential development of thousands of new houses on Wisley Airfield is simply baffling given the complete inability of the local resources and infrastructure to cope - for instance have you ever tried to park at Effingham...
Junction Station? How do our narrow roads cope - is the Council proposing to upgrade roads, stations and build new faculties to cope with more than doubling the number of houses?

- The Horsleys have already outgrown the facilities, so proposing large numbers of new houses ignores the ability of the Horsleys to absorb them, for the sake of developers profits - note that the Wisley Airfield developers are a Cayman Islands company, presumably to avoid paying UK tax!

I ask that you please conduct a much more rigorous assessment of the proposal, which I believe will confirm the points above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am writing to object to proposals contained in the Guildford Borough Council New Local Plan 2016. I am a resident of West Horsley and I am really concerned about the impact of the significant level of proposed new development on our community and on our quality of life.

I am particularly concerned about the likelihood of increased flooding in our village as a result of this proposed development. Our local road, The Street in West Horsley, has a major flooding problem and development in West Horsley to the south of the railway line will just add to this flooding problem. I therefore object to the housing development proposals due to the likely impact on flooding. Since we have lived in West Horsley we have seen no improvement in the Council’s ability to deal with this flooding problem so I am very concerned that it will simply get worse with more housing developed in the area.

My children both attend the local primary school, the Raleigh School in West Horsley. It is already clear to me that the school’s infrastructure can barely cope with the existing number of children. With around 400 pupils already at the school, by way of examples, the playground and playing fields are far too small and when there are class assemblies, there is often insufficient room for all parents who turn up to fit into the assembly hall to watch their children.

When dropping off my children in the morning and picking them up in the afternoon, it is often a real problem to park near the school. Cars of parents are often parked on the pavements in the narrow roads surrounding the school which forces parents and children to walk into the roads to get to school, this is very unsafe and is not satisfactory. I object to any further housing development in the Horsleys due to the increased pressure that this will add to the Raleigh School and the surrounding roads.

I further object to the proposed level of new Housing development in the Horsleys due to the added strain this will place on our community of sports and social clubs. Many of our local sports and social clubs are over-subscribed and there are waiting lists to get our children into these clubs. This already means that many local children miss out on sport and social activities that they very much want to do. More housing will make this problem worse and force children to join clubs further afield which will damage our community.

The proposed level of new housing development in the Horsleys will require a substantial number of heavy goods vehicle movements during the construction phases, which will last for years. The condition of many of our roads including The
Street, East Lane and Long Reach in West Horsley and Ockham Road North, Ockham Road South and The Drift in East Horsley are already dreadful in many places and this is both dangerous (cycles and cars swerving) and costly in the damage that it causes to our vehicles and cycles.

Significant HGV movements that will be needed to facilitate these developments will make this position far worse. Since we have lived in West Horsley (over 4 years) we have seen no improvement in the condition of our local roads, but in fact a clear deterioration. In addition to the damage to our roads that HGVs will cause, I am also very concerned about the safety of community, especially children, in living in close proximity to these very large vehicles. Our roads are simply not large enough to cope with these large trucks, existing cars, the many cycles and many of the pavements are very narrow which is especially dangerous for older people and children. I therefore object to the housing proposals in the Horsleys due to the damage to our roads and pavements that it will cause and the very real safety risk to our communities.

I also object to the increased levels of pollution and dust that will be caused by HGV movements and the construction process itself in delivering hundreds of new homes in the Horsleys. My daughter has allergies to dust and airborne pollutants and I am very concerned that this will become worse in our villages if significant development occurs. I do not want us to become prisoners in our own homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
18. **OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology I believe is inaccurate; inflating the needs of the borough by distorting student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. **This is not democratic and is not appropriate for consultation of the Plan.**

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/3890</th>
<th>Respondent: 15462785 / Thomas McMinn</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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14. **OBJECT** to Gosden Hill development being in the Local The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land: all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
15. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. Development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6. I OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8265  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY E6 - The leisure and visitor experience

I OBJECT Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for "overdevelopment". Heritage sites and the Green Belt are particularly vulnerable. Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town- break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust the objections made above are fully considered and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8263  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford Borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8264  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
19. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8260  Respondent: 15462785 / Thomas McMinn  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9.1 OBJECT due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages already suffer from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on local roads.

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, West Clandon included, already suffer from traffic congestion. Development around these villages will result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become ever popular, particularly at weekends with hundreds of cyclists passing through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements, as they often need to.

10. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1) Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being significant for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents will see their quality of life significantly deteriorate.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is not sustainable.

There is no provision for the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8261  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I worry that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and neighbouring villages merging into each other. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8253  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to development in areas which are at risk of flooding (Policy P4) National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I am aware that this site often floods during winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re- commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8250  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8251  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly formulated. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including economic growth. These data now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too large a tri-borough area for its residents.
work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1963  Respondent: 15462849 / Penelope Jane Boyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Re: Objection to the 2016 draft local plan

I am writing to express my opposition to the draft local plan currently under consideration, namely:

I object to the removal of Send from the Green Belt

I object to the removal of any other villages from the Green Belt

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough.

I object to the lack of proper consultation - the proposed sites in Send were not included in the previous consultation in 2014 - the borough of Send have not been properly consulted and all its sites have been changed substantially.

I object to the last minute inclusion of sites and object to the massing of these new housing proposals in one area of the borough.

I object to the complete lack of consideration of the impact of these proposals on highways, education, transport or medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8258  Respondent: 15462881 / Richard and Jackie Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We would like to register our objection to the proposed plan to take Chilworth out of Green Belt protection.

We would suggest that without significant improvements in road infra-structure Chilworth cannot cope with the extra traffic resulting from any large scale housing development that would be a consequence of this Local Plan and the removal of protection against development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1964  Respondent: 15462913 / Anne Concanen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I am writing to object to the proposed building development in Normandy for the following reasons.

- The proposed release of green belt land for building will mean a dense housing development totally out of keeping with the Village of Normandy and the existing rural environment. I have seen no assessments of the effect that development will have on the Green Belt or have been given any reason why this particular area of Green Belt has been considered for release.
- Any benefit provided by the scale of development would be negated by the damage done to the environment. Supposed benefits such as a new school would not be necessary without the housing and surely the existing children in the village should be allowed to explore their green space. Dense development will also destroy large areas which are valuable habitats for wildlife.
- The area under consideration is on heavy clay and there have been serious flooding problems. To cover this space with concrete seems to go against all that has been learnt about building developments and flooding.
- No attention seems to have been paid to the transport infrastructure of the area. At the North end, Glaziers Lane and Westwood Lane lead to the only crossing of the A31 and giving access to the A3. Already roads leading to Guildford, Farnham and Aldershot are gridlocked during the rush hours. A large number of extra people travelling during these time would be insupportable. In addition, travelling would be more dangerous with greater traffic jams and accidents more likely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8266  Respondent: 15462945 / Fiona Puttock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I am writing to object to the 2016 draft local plan. We moved from Ockham last year after 22 years of living in this Green Belt area. This is how this area must remain, GREEN BELT! This area, Ripley, Send and Clandon does not need disproportionate development to ruin its villages. With far too many developments which would result in disastrous consequences. Please re-think and keep this area as it should be GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1971  Respondent: 15463009 / P M Proctor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to you because I object to the 2016 Draft Local Plan. In particular I object to any encroachment on GREEN BELT land which under your plans would be lost forever and deprive future generations from enjoying it.

You are obviously targeting the villages in North Surrey and I object to your policy of 'in-setting' these villages, particularly Ripley, Ockham, Send, the Clandons and Horsleys to name just some. I also object to what is clearly a disproportionate amount of development in one area.

I particularly object to the underhand way in which the Garlick's Arch site has been handled allowing a development of at least 400 houses to be considered with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3894  Respondent: 15463009 / P M Proctor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although there are many other aspects of the latest version of the Guildford Plan which have clearly not been thought out properly, I will not add to my list of objections at this stage, except for the outrageous issue which is the long standing Wisley Airfield site and the fact that despite a unanimous decision of the Council to turn down this Application, it has been allowed to remain as part of the Guildford Plan. This disgraceful decision is an assault on the electorate and unless speedily rectified will be indelibly engraved in the hearts and memories of voters. So you may take it that I also strongly object to any development of the Wisley Airfield site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Site A35 Wisley Airfield
I object to the proposed increase to 95.9 hectares. The resultant increase in traffic volumes would be excessive on top of the existing traffic levels especially in Ripley where traffic is often at a standstill at morning and afternoon peak times. Newark Lane, in particular, cannot cater for any additional traffic and yet it would be the most likely favoured route for traffic to Woking from the Airfield development. Once again I object to the gross misuse of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/164  Respondent: 15463009 / P M Proctor  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 Garlicks Arch
I object to the increase in houses to a figure over 600. I further object to the provision for Travelling Showpeople Plots, which would obviously involve the use of articulated lorries and other transportation vehicles. These would be wholly unsuitable in this area, especially when accessing on to the B2215 road. The proposed inclusion of these plots is out of line with the original plan and is in a Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2761  Respondent: 15463009 / P M Proctor  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in houses to a figure over 600.
I further object to the provision for Travelling Showpeople Plots, which would obviously involve the use of articulated lorries and other transportation vehicles. These would be wholly unsuitable in this area, especially when accessing on to the B2215 road. The proposed inclusion of these plots is out of line with the original plan and is in a Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A58 Burnt Common
I object to the change which includes this new aspect of industrial development which may involve Waste Management Facilities. It would be totally unsuited to this area and would involve very considerable additional heavy traffic on the local, overloaded, roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/2762  Respondent:  15463009 / P M Proctor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change which includes this new aspect of industrial development which may involve Waste Management Facilities. It would be totally unsuited to this area and would involve very considerable additional heavy traffic on the local, overloaded, roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/3895  Respondent:  15463649 / Joseph Davey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley can not cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Fam1 Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
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Comment ID: PSLPP16/8269  Respondent: 15463713 / Tracey Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

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5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
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Comment ID: PSLPP16/8270  Respondent: 15463713 / Tracey Broadhurst-Jones  Agent:  
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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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Attached documents:
We object strongly to both these policies under P2 Para. 4.3.13 and 4.3.16 respectively.

They would destroy the rural nature of East Horsley, with its low density housing, and are contrary to the guidelines of the NPPF, putting much open agricultural and recreational land under risk of intense housing development.

The proposal to remove Wisley Airfield from the Green Belt under 4.3.17 and Policy A35 is outrageous, when approval for planning application 15/P/00012 has recently been refused for very good reasons, as totally unsuitable for the location. Guildford Borough Council's refusal of 15/P/00012 stated that the application was non compliant with existing Local Plan 2003 policies G1, G5, H11, HE4, HE10, HE1, NE4 and RE2, Chapters 4, 6, 12 of the NPPF and other regulations including the South East Plan 2009.

We endorse the comments expressed in East Horsley Parish Council's supplementary letter dated 4-7-16 and object in the strongest possible terms to the inclusion of Wisley Airfield in the list of potential sites and its removal from the Green Belt.

Our grounds for objecting include:

1. The fundamental breach of Metropolitan Green Belt rules, regulations and the underlying spirit
2. That unfulfilled housing need does not qualify as a 'very special circumstance'.
3. That it would not meet acceptable levels of sustainability, with deficiencies such as lack of infrastructure, sewage, schools, medical services, shops and local employment, together with the destruction of agricultural land and environmental damage.
4. Severe impact on local traffic due to the lack of adequate public transport and consequently excess motor traffic travelling on inadequate country. This is exacerbated by the current problem of large vehicles that are too wide for the lanes being directed here by inappropriate SatNav instructions.
5. Damaging health and safety issues for the proposed new residents arising from NOx emissions due to the close proximity to the M25 and A3.
6. Deleterious effects on local wildlife.
7. Development that would be destructively out of character for the area.

We agree with the paragraph in the Spatial Vision Section 2 that the growth in the plan is predicated on the delivery of the necessary infrastructure. The lack of suitable infrastructure has been one of the reasons for the refusal of planning applications in the past. However, we do not agree that this expression of intent is sufficient justification for many of the developments proposed in the plan and we question whether the proposed infrastructure improvements are actually feasible, economically viable and advantageous to this area.

East Horsley Parish Council's first letter addresses the shortcomings of the East Horsley infrastructure under Policies I1, I2 and I3 and we endorse the need to make improvements to roads, drainage, pavements, schools and medical facilities. These do not all come under the aegis of Guildford Borough Council and the failure to address the deficiencies of the existing infrastructure to meet the needs of the present population is a good reason to doubt the credibility of the intentions in the plan.

Regarding the Site Policies in particular, we have strong reservations about the suitability of Policies A36 ('Thatchers' (Ramada) Hotel, Guildford Road); A37 (Bell & Colville); A38 (East Horsley); A39 (Ockham Road North); A40 (East Horsley) and A41 (East Horsley), representing a total of 533 houses. We object on grounds of both the high density of houses intended to be built and the way that the two villages of East and West Horsley, which have very different characters, would become merged into one semi-urban sprawl - in effect a housing estate. In particular cases such as A36, we have major concerns about highway safety on the A246.

Guildford Borough Council continues to claim, hypocratically, that it is defending the Green Belt, while attempting to impose excessive, unjustified housing numbers. The residents of East Horsley feel very strongly about the potential impact of the changes proposed in the plan and, while not presuming to comment on the many other villages within the borough that would be similarly affected, we do enjoin Guildford Borough council to proceed no further with these proposals without the explicit agreement of all the affected communities within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPA16/1973  **Respondent:** 15463777 / Jade Broadhurst-Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Comment ID:** PSLPS16/3897  **Respondent:** 15463777 / Jade Broadhurst-Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

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I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1978  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3901  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/8287  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Attached documents:

Comment ID: PSLPP16/8285  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8288  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8286  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the ‘insetting ’ of Send, Ripley and Wisley from the Green Belt.
2. I object to the disproportionate amount of development in this area of the Borough.
3. I object to the lack of any evidence for the alleged housing needs.
4. I object to the plan to build 7,000 sq.m of industrial space on Green Belt land, when it could, and should, be put on a brownfield site.
5. I object to the very limited consultation period allowed.
6. I object to the last minute inclusion of the Garlick's Archsite.
7. I object due to the fact that the local roads and infrastructure could not cope with the increase of traffic that these developments will cause.
8. I object to the lack of immediate provision for new schools which the increase in population would need.
9. I object to the lack of immediate provision for Doctors surgeries, when the local Villages Medical Centre is already oversubscribed.
10. I object to the new A3 interchange at Burnt Common which would in no way alleviate traffic in Ripley or Send if the proposed development goes ahead. I would like the Inspector to see my objections.

In conclusion, the Plan does not serve the interests of the local residents in Send, Ripley, Wisley and Clandon. The Council is going directly against the stated Conservative Government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1980  **Respondent:** 15464001 / Keiron Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

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**Comment ID:** PSLPS16/3904  **Respondent:** 15464001 / Keiron Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Attached documents:

Comment ID: PSLPP16/8299  Respondent: 15464001 / Keiron Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Attached documents:

Comment ID: PSLPP16/8297  Respondent: 15464001 / Keiron Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

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**Comment ID:** PSLPA16/1981  **Respondent:** 15464129 / Warren Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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**Comment ID:** PSLPS16/3906  **Respondent:** 15464129 / Warren Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPP16/8307  Respondent: 15464129 / Warren Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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Comment ID: PSLPP16/8304  Respondent: 15464129 / Warren Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1989  Respondent: 15464161 / Toby Marshall  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write further to the publication of the above document and write to express my objection to elements of its contents.

My principle overarching objection is the proposal to take a number of Surrey villages out of the Green Belt, and East and West Horsley in particular. This proposal in particular will have "urbanisation" implications far beyond those envisaged by the mantra that more houses must be built in the Borough. Whilst I fully accept the need to provide additional housing in the Borough, I do not agree with the drastic actions of removing the Green Belt status in order to be able to provide large scale developments that would otherwise be subject to far greater planning scrutiny.

1. Your proposal to remove a number of classic Surrey villages that currently give the area its charm, beauty, character, history and overall appeal is outrageous.

   1. I object to your proposal to remove the Horleys from the Green Belt. The Green Belt was established for a very defined purpose by statute. It was designed to prevent urban sprawl and to a large extent has succeeded in doing this. It is there for the benefit of not just our generation but those that succeed us. This area not only contains many areas of Outstanding Natural Beauty but also Sites of Special Scientific Interest. The Green Belt enables these areas to be protected in order that the Guildford/Leatherhead/Dorking area does not become a suburban sprawl such as Hersham/Weybridge/Walton on Thames.

   1. Large numbers of people visit the Surrey Hills area because of its stunning beauty, villages and leisure. These visitors in turn support many businesses both large and small whose livelihood depends upon the area retaining its rural charm. You simply have to remember that these people are your citizens, your ratepayers and your electorate and changing the nature of their environment will potentially destroy the uniqueness of their businesses.

   2. I object to the volume of housing, and associated density of construction, which is currently proposed in the Horsleys is completely out of keeping with their village. The proposal to build 180 houses in East Horsley and...
411 In West Horsley is completely disproportionate to the housing stock currently in existence. There has not been any detailed study undertaken proving the need for this level of housing in these locations, the size and style of the proposed houses or the impact on the surrounding infrastructure.

3. I object to the proposals as many of these sites do not reflect the level of infrastructure in place to support such a volume of housing, from schools to medical facilities, shops, bus services, train station parking and we have seen how many villages in the area have been blighted by the bolt on Council Estates of the post war years - dumped on village back land with no regard to the architectural merits of the development, the local amenities on offer or the employment of the proposed residents. Each site should be considered on its own individual merits under the existing planning regime which has been designed to protect the environment of our rural life and given its particular circumstances.

4. I object to the proposal to build 100 houses on site A39 in East Horsley as it is fundamentally The plan already recognises that the site is in a flood plain and notes that the flood risk needs to be reduced and that accordingly there is to be no greater flood risk to anywhere else. Surely by interfering with the flood plain in this location can only transfer the flood plain impact somewhere else? That may be downstream of the site or onto adjoining properties. If there is no interference with the flood plain at the site doesn't become viable for 100 houses.

The existing proposal by Cateby Land to develop 100 affordable homes here simply does not sit comfortably with any sustainable, accessible or employment rationale. It is building the wrong types of houses in the wrong place.

5. I also do not believe that the Council has given sufficient regard to where all these new inhabitants are going to. There is little or no employment in these villages, there is very little bus transport, the railways are currently crammed in rush hour with no room for extra capacity and the station car parks are not big enough to cater for more cars. And yet how are people meant to get to work in Guildford, Woking and London as the primary employment centres? The answer will be by car, whether this be by way of a short journey to the station (where they will end up parking on the streets) or a full journey into Guildford (which is already rammed in rush hour). I cannot see how this can sit comfortably with the Council’s Green agenda. The Council certainly will not be able to force the bus and train companies to extend their services as these are now privately owned businesses operating for profit.

6. I object to the Council’s failure to unlock the development potential of brownfield sites and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of

Remember, there will be no opportunity to undo any development resulting from these proposals. You will not be able to wind back time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
On Policy A39 arbitrary wording has been added to include self-building or custom building plots within the allocation of 100 dwellings in order to make the policy compliant with national legislation as opposed to what is appropriate for the site.

The allocation of 100 dwellings on this site contravenes Policy D4 which inter alia states that:
• Ensure appropriate densit’ to make the most efficient use of tile land whilst responding to local character and context”. 100 houses on a 5.7ha site does not respond to local character and context given the nature of the immediately surrounding houses and the general established density of development in the village of Fast Ilorsley.

The inclusion of self-build or custom build plots will not enable this density to be achieved as these type of developments will require a greater plot size to make them viable. I therefore object to the inclusion of Policy site A39 as a site for 100 homes as this is not a site that is capable of sustaining this number of dwellings if the principles of Policy D4 are to be observed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/719   Respondent:  15464161 / Toby Marshall   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On infrastructure, the revised plan proposals do not address the additional strain on infrastructure despite the overwhelming objections on this subject in response to the previous consultation. In particular the wording of Policy ID has been amended to give the impression that provision of adequate infrastructure will be enforced. However, this is not within the gift of GBC. but, in the case of the road network, by Surrey Highways and Highways England both of whom will be influenced by budgetary constraints elsewhere within their jurisdiction. Equally traffic impact assessments will be prepared, and paid for, by applicants and not by GBC and will therefore present a biased outcome in support of any development. I object to the inclusion of all sites other than brownfield sites on the basis that that GBC will be unable to secure or enforce the provision of the requisite infrastructure provisions either by negotiation with developers or through other government agencies. Any development must be in current urban or brownfield site areas where there is already an appropriate infrastructure provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/720   Respondent:  15464161 / Toby Marshall   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The development of the former Wisley airfield is clearly at odds with revised policy 1D3. It is simply not possible to offer a sustainable transport policy for a site which is positioned in this location in the middle of nowhere, with no local amenities, narrow country lanes, no lighting and no public transport facilities. I object to the inclusion of the former Wisley airfield within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/717  
Respondent: 15464161 / Toby Marshall  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No consideration has been made in the revised proposals for the principle enshrined within the NPPF that exceptional circumstances must be demonstrated in order to develop within the Greenbelt. The proposal to inset the village of East Horsley has not been justified by exceptional circumstances. No account appears to have been made in the revised plan to the overwhelming body of public opinion that objects to the development of the greenbelt and which advocates the development of brownfield sites as priority. I object to the development of new accommodation on the Greenbelt and to the proposal to inset the village of East Horsley and others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1982  
Respondent: 15464193 / Matthew Mills  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3907  
Respondent: 15464193 / Matthew Mills  
Agent:
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM} from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/3908  **Respondent:** 15464353 / Tracey Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/8320  **Respondent:** 15464353 / Tracey Mills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8318  Respondent: 15464353 / Tracey Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8321  Respondent: 15464353 / Tracey Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8319  Respondent: 15464353 / Tracey Mills  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1985  Respondent: 15464481 / David Mills  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3909  Respondent: 15464481 / David Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

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I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8326  Respondent: 15464481 / David Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8324  Respondent: 15464481 / David Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1986  Respondent: 15464577 / Andrew Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3912  Respondent: 15464577 / Andrew Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8343  Respondent: 15464577 / Andrew Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8339  **Respondent:** 15464577 / Andrew Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8344  **Respondent:** 15464577 / Andrew Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8341   Respondent: 15464577 / Andrew Brown Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1997   Respondent: 15464673 / Trudy Grey Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1998  **Respondent:** 15464673 / Trudy Grey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

23. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3927  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to the scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3928  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays Surrey Fire and Rescue

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burtoncommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane

Burpham

- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3929  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

21. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.
The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport.

With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/3930</th>
<th>Respondent:</th>
<th>15464673 / Trudy Grey</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8355  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8362  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8363  Respondent: 15464673 / Trudy Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8352  Respondent: 15464673 / Trudy Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8353  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional
circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality
area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the
Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to
these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a
further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8354  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified
villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses,
which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will
result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8365  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value visitors. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local services. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8361  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages
than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8360  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
17. POLICY H3

I object to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers...
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy
mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear
market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8356  **Respondent:** 15464673 / Trudy Grey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

9. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure
(Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane
junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on
these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for
only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a
further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around
these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more
congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the
villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in
road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise,
pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of
the road making it very dangerous, especially when vehicles mount the pavements.
This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/8357</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8358  Respondent: 15464673 / Trudy Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8350  Respondent: 15464673 / Trudy Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this...
Policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1) The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8349  Respondent: 15464673 / Trudy Grey  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would...
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence.

The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1194  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant,
explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1195  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 1. This is demonstrably untrue and appears designed to bias the consultation process. This is demonstrably untrue and appears designed to bias the consultation process.
   2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
1. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

1. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

1. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

1. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

1. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

2. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

1. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

2. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

3. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

4. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18

5. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involve. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
6. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

7. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

8. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

1. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

2. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1196  Respondent: 15464673 / Trudy Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8394  Respondent: 15465313 / Carole Crichton-Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. There would be a massive increase in both industrial and private traffic. The existing roads and traffic are a nightmare now with the current flow.
2. The constant diversions & roadworks already create a huge buildup of traffic. Any extra work needed -more traffic lights, laying of electrical & gas cables, sewage pipes etc would mean increased massive hold ups for any traffic now plus the extra cars & other traffic that comes with new houses & building works.
3. The proposal means huge amounts of extra people, houses, traffic with accompanying shops, pubs, leisure facilities, public transport, new parking areas, the laying of cables, pipes, extra sewage works, refuse collection, schools, school transport, school parking areas, car parking, public lavatories, buses, doctors’ surgeries with their parking requirements etc. The existing surgery in Send is at breaking point already there is no room there for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8396  Respondent: 15465313 / Carole Crichton-Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. We are a rural Green Belt area and the government's mandate as stated before they were elected was to protect the Green Belt NOT to decimate it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8391  Respondent: 15465313 / Carole Crichton-Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE 2016 DRAFT LOCAL PLAN :

To remove Ripley, Send & Clandon from the Green Belt. Garlick's Arch redevelopment of at least 400 houses & industrial site.

2.000 houses propsed for Wisley site.

2.200 houses at Gosden Hillsite.

1.800 houses on Blackwell Farm site. 4-way on/off ramp to A3 at Burnt Common.

The south east -in particular Surrey -has the largest population density of any county within the UK. The proposed development would impose complete & utter overload on the already overloaded infrastructure. This is already straining at the seams with the existing density of people & traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2010  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I consider the calculation of housing need is The model has not been scrutinised and fundamental assumptions are flawed. Housing target is unconstrained;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000
objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3936  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object specifically to proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment four times the size of the village it blights;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3941  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed. 2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3942  **Respondent:** 15466113 / Tim Grey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. POLICY A43 AND A43a – Garlick’s Arch</th>
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<tbody>
<tr>
<td>I OBJECT to Policy A43 and A43a on Garlick’s Arch.</td>
</tr>
<tr>
<td>The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.</td>
</tr>
<tr>
<td>The site is susceptible to flooding and will not make a suitable site.</td>
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<tr>
<td>The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.</td>
</tr>
<tr>
<td>I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.</td>
</tr>
<tr>
<td>It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)</td>
</tr>
<tr>
<td>The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.</td>
</tr>
<tr>
<td>The development will cause harm to the ancient woodland on and by the site.</td>
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<tr>
<td>Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.</td>
</tr>
<tr>
<td>Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).</td>
</tr>
<tr>
<td>The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a...</td>
</tr>
</tbody>
</table>
Council meeting on 11th May 2016. Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/3943</th>
<th>Respondent:</th>
<th>15466113 / Tim Grey</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT to Policy D3 - Historic environment.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
16. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.
I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8423  Respondent: 15466113 / Tim Grey  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

18. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
• To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

• To help make Guildford’s river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

• To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

• To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8417  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8422  Respondent: 15466113 / Tim Grey  Agent: 

17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8411  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.
The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II.

By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8413  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8402</th>
<th>Respondent: 15466113 / Tim Grey</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object that housing on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/8414</th>
<th>Respondent: 15466113 / Tim Grey</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8397  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79);
- I object to the changes to Green Belt This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8400  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is...
all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the scale of new building throughout the borough, which is disproportionate and unjustified;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8399  Respondent: 15466113 / Tim Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8404  Respondent: 15466113 / Tim Grey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no
have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to
Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green
belt, demand for housing is, in practical terms, unlimited.
Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter
commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's
commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase
availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter
belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green
Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to
have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is
justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike
(say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex
housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There
was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready
alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers
derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to
build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest
of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an
inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised
by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden,
protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious
doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims
their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not
transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated
on this OAN, the plan as a whole cannot be considered “sound”.
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical
because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable
because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local
and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in
due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent
years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the
land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more
important.
The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning
permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be
planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan”
that fails to propose a target number that takes all the standard constraints and adjustments realistically into account,
leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline
figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of
Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).
Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the
housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the
plan as a whole.
needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1205  **Respondent:** 15466113 / Tim Grey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

24. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the

Answer

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.
As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1207  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not it has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
6. The housing number is at least twice the achieved rate of building in the Borough over the last few. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been.

23. The status of the text which accompanies each policy box is not clear.

If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.A. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

BULLET POINT OBJECTIONS RELATING TO WEST CLANDON & IMMEDIATE SURROUNDINGS

- Over 20,000 responses objected to the 2014 draft Plan and therefore I Object that this Plan is not materially different and the Consultation Process has not been properly followed for this Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1204  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1202  Respondent: 15466113 / Tim Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re: Responses to Guildford Borough Proposed Submission Local Plan

(June 2016)

Over Arching Concerns

In 2014 I assisted my Mother in responding to the consultation on the ‘Draft Local Plan.’ She was then a resident of West Clandon. She has now moved to Burpham. My wife and I have recently moved to West Clandon in her stead. My mother had asked me to assist her in responding to your lengthy and overtly excessive public consultation, as I have recent experience as a Borough Councillor and Chair of Planning in a neighbouring Borough Council in Surrey.

As part of my role there I introduced and piloted the Core Strategy, as we chose to call it, in 2011. We were the second LPA in the Country to submit our plan to the Secretary of State. At the time GBC were entirely non-reactive to the requirement imposed by the former government to find 260,000 further homes in the South East. After virtually all the LPAs in the South East had submitted Local Plans, Core Strategies, call them what you will, to the Secretary of State under the original requirements, GBC had still failed to do anything of note. Certainly there had been no consultation, no draft plan of any sort and little if any effort made to sensibly engage with the need to release brown field sites for the provision of new housing quotas.

When, in 2014 you went out to consultation it was abundantly clear you did so in a rush and at a time when even the most myopic of LPAs could see Central Government shifting goalposts swiftly and with the NPPF constantly being amended and updated. The Case Law gave further pause for considerable thought, and yet GBC ploughed on with a Local Plan that was very clearly ill thought out and a knee jerk reaction following a prolonged period of total inactivity by GBC as the LPA. To put it in the words of a property developer I know well “GBC panicked and threw the marbles on the map. Wherever they landed they whacked in another 1000 houses to the SHLAA.”

As charitable as I have tried to be in my assessment of what has happened with the Planning Department at GBC, conscious as I am of the lack of resource available to Local Authorities, particularly second tier authorities in Surrey in light of recent news, I come to the inescapable conclusion that massive mismanagement is at the heart of the issues GBC now has with fulfilling the updated new homes requirements of Central Government.

Some might consider that pausing and critically assessing why GBC is in the situation it is in would be both sensible and necessary to avoid making the same mistakes. Unfortunately I see nothing save for a further ill-conceived head long rush to release previously unbuilt land and relinquish yet more green belt in an effort to meet a target you have taken almost no sensible approach in meeting.

There are significant brown field sites within GBC, there remain significant areas within the existing development curtailage. Yet there seems to be no intention of making those sites work for GBC and the Residents of GBC in meeting targets.

The inescapable conclusion is that by its own irrational mismanagement in the first place GBC has found itself unable and unwilling to devote the necessary time and decision making to coming to a sensible and proportionate approach to the Local Plan to 2027.

I am conscious of the significant governance issues that have dogged your Planning department for a number of years and have every sympathy with those who now have to cope with the mess left by others. However, it seems clear to me that whatever the outcome of the hastily and ill timed original consultation, the refusal to accept the information gathered therein and the re-arranging of an equally ill-thought through consultation process and amended Local Plan this time is highly susceptible to challenge via Judicial Review, a costly and unwelcome process as we all know.

I am deeply troubled to think that my Local taxing authority will be marching headlong into the kind of behaviours that are likely to lead to extremely significant costs in the Administrative Court and possibly beyond. It is ultimately tax payers money that will fund such litigation. I am deeply troubled by how those charged with gathering and protecting our collective revenue are behaving in such a way as to put at significant risk not only our environment both built and natural, but also our money.
I accept that the requirements of Central Government are likely to lead to the need to release some green belt, but I fail to see how the wholesale release of huge tracts of GBC is either proportionate, necessary or in planning terms preserving the green corridors and open spaces which characterise not only GBC but Surrey as a whole.

The very significant and well considered objections formulated by residents both in West Clandon and beyond are set out below, as I am sure you are aware.

For completeness I endorse all those concerns set out below and adopt them as my own views and objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/3951  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Cou
- No Green Belt "exceptional circumstances"
- Not a brownfield site as stated - only 15% of
- Proposed SCC waste site
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath
- SANG would harm on
- Will aggravate traffic jams at A3 roundabout and M25 Junction 10
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic
- Housing density far too
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3950  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local
- Housing density excessive when compared with existing
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support
- Collective impact of these 6 sites on a small part of the borough not Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the plan ned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt
- Sites Key infrastructure Jacking. No adequate provision is made to increase it -e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don't contribute to Green Belt "open ness".
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81- e. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of G range Park Opera's new "Theatre in the Woods".
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/8442  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY D1 (BETTER PLACES):

- Poor
- No force given to vernacular or historic design guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8443</th>
<th>Respondent: 15466177 / D.L. + E.J. Wilkinson</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</tbody>
</table>

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8445</th>
<th>Respondent: 15466177 / D.L. + E.J. Wilkinson</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</tbody>
</table>

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can't "enhance" historic places.
- Doesn't ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn't ban development near historic sites.
- Ignores NPPF 126, 131, 132, 133.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can't afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that's needed elsewhere in the county.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural areas.
- Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th><strong>Comment ID:</strong></th>
<th>PSLPP16/8435</th>
<th><strong>Respondent:</strong></th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td><strong>I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):</strong></td>
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<td>• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td><strong>I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):</strong></td>
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<td>• Subordinates public planning policy to the University of Surrey's private, commercial enterprises (not its public academic purpose).</td>
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<td>• No cost/benefit analysis of harm to Green Belt involved in extending research</td>
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<td>• Waters down research purpose of park, turning into a general business park.</td>
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I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas' character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village
- Established commitments to high-speed rural broad band and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8437  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn't depend on building "attractions" which can harm heritage and rural setti No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8438  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford's rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment
- Proportion of new housing in town far too Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Fustile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8439  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford's role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8440  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### I OBJECT TO POLICY E9 (LOCAL CENTRES):

- No need for retail development "adjacent" to rural centres for same reason as Policy E8

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/8424</th>
<th>Respondent:</th>
<th>15466177 / D.L. + E.J. Wilkinson</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### I OBJECT TO POLICY H1 (HOMES FOR ALL):

- Policy doesn't set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn't put out to formal public consultation and wasn't scrutinized by Councilors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8425</th>
<th>Respondent:</th>
<th>15466177 / D.L. + E.J. Wilkinson</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a jok Affordable homes round here are not affordable! Pushing for these homes ju st means pushing for more development.
- The viability clause lets developers off the book of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don't have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.

• This policy won't affect market forces or house Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8426  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

• It loosens the criteria by allowing "market housing" and development that changes the housing Developers would be able to override NPPF "exceptional circumstances" and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8447  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY ID1 (INFRASTRUCTURE & DELIVERY)

• Infrastructure considered here as an afterthought, rather than pre-condition of Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any fund ing or provision for
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrast
• Draft CIL scale discourages use of brownfield land
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the cou. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8448  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP'S ROAD STRATEGY):
  • Doesn't allow for catastrophic increase in traffic resulting from spreading new housing estates across the cou.
  • Out of sync with DTP's strategy: houses to be built and Green Belt destroyed before plans for A3 etc im
  • Road plans too optimistic anyway, especially post. Probably won't happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8449  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):
  • Just a list of generic measures, not related to real life or the particularities of
  • Fails to treat sustainability as a Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
  • Un Most people can't or won't walk or cycle -- commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. i.e. most residents!
  • Town's eye view of Ignores scarcity of existing rural public transport and commercial unviability of increasing it
  • Town's eye view of Ignores terrible state of Surrey's roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO POLICY 14 (GREEN & BLUE INFRASTRUCTURE):

- No Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it's just treated as potential building land with a few inconvenient
- Impact of Green Belt development on local agriculture
- Impact on rural leisure and tourism
- Impact on flood control
- Impact on carbon sink and knock-on effects for air pollution and climate change
- Impact on biodiversity
- Impact on natural heritage
- Impact on water catchment
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc)
- Impact on rural business (e.g. mineral mining, film making)
- Impact on natural landmarks and views
• Harm to public health and well being (physical, psychological)
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the N
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.

• Disproportionate amount of development (most of it, in fact) to be in Green Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• "Insetting" of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to "open ness" is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8428  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

• Gives Ash and Toogham more protection than rest of borough, including existing Green Bu t they don't contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and h is predecessor . Politically
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8429  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hard standing sites, pushing development unnecessarily into the countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8430  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8412  Respondent: 15466177 / D.L. + E.J. Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY SI (SUSTAINABLE DEVELOPMENT)

- No definition given, no reference to its importance to the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8418   Respondent: 15466177 / D.L. + E.J. Wilkinson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Numbers based on growth and demographic data now invalidated by Br.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand bow we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commutes or travel far outside the Area to shop. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4505   Respondent: 15466209 / Janet Parry-Morris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Over-large sites in rural locations

The inclusion of over-large housing, industrial and warehouse developments in the plan, such as Garlick’s Arch, would have a detrimental impact on the villages of Send and Ripley and the local community. I object to the allocation of land to the Garlick’s Arch development as it would have a detrimental impact on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8431 Respondent: 15466209 / Janet Parry-Morris Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Overloading local healthcare facilities.
   I object to the additional pressure on local healthcare facilities should the plan be implemented. Local health services, like the Villages Medical Centre, Send, are already over-stretched. Delays in seeing doctors and nurses would be much worse if the local plan be approved.

2. Local roads unsuitable for heavy vehicles and additional traffic

   Local roads around villages like Ripley, Send, and Clandon are narrow and unsuitable for additional heavy traffic. The additional housing, industrial and warehousing elements on sites like the Garlick's Arch proposal will make the situation much worse. I object to the proposed local plan development because local roads would be unable to cope with the additional traffic.

3. Congestion on village roads and lanes

   Many local villages suffer from long traffic delays and congestion. Junctions like Newark Road and Rose Lane in Ripley, and the Shell roundabout at Burnt Common often have long traffic queues, which are likely to be significantly worse should the local plan be implemented. I object to the further congestion in and around our villages the development would cause.

4. Congestion on local trunk roads

   Local trunk roads such as the A3 and M25 already suffer severe congestion during the rush hour. I object to the development of sites in the vicinity of trunk roads where there are current issues with rush-hour congestion.

5. Parking issues in local villages

   Parking in local villages such as Ripley is already an issue. It's frequently impossible to find parking in the
village for longer than two-hour periods. I object to the proposals as further development around our villages and an increased population would make parking even more difficult.

6. Lack of infrastructure planning for proposed sites

I object to the lack of proper infrastructure planning of local services such as dentists, doctors and schools. The local infrastructure is already stretched, and planning for the implementation of improvements to infrastructure does not appear to have been adequately considered. This is particularly relevant to Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9814  Respondent: 15466209 / Janet Parry-Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9817  Respondent: 15466209 / Janet Parry-Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Lack of infrastructure planning for proposed sites

I object to the lack of proper infrastructure planning of local services such as dentists, doctors and schools. The local infrastructure is already stretched, and planning for the implementation of improvements to infrastructure does not appear to have been adequately considered. This is particularly relevant to Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local roads unsuitable for heavy vehicles and additional traffic

Local roads around villages like Ripley, Send, and Clandon are narrow and unsuitable for additional heavy traffic. The additional housing, industrial and warehousing elements on sites like the Garlick’s Arch proposal will make the situation much worse. I object to the proposed local plan development because local roads would be unable to cope with the additional traffic.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Congestion on village roads and lanes

Many local villages suffer from long traffic delays and congestion. Junctions like Newark Road and Rose Lane in Ripley, and the Shell roundabout at Burnt Common often have long traffic queues, which are likely to be significantly worse should the local plan be implemented. I object to the further congestion in and around our villages the development would cause.

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Local trunk roads such as the A3 and M25 already suffer severe congestion during the rush hour. I object to the development of sites in the vicinity of trunk roads where there are current issues with rush-hour congestion.

Parking issues in local villages
Parking in local villages such as Ripley is already an issue. It’s frequently impossible to find parking in the village for longer than two-hour periods. I object to the proposals as further development around our villages and an increased population would make parking even more difficult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8420  Respondent: 15466209 / Janet Parry-Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 'Guildford Local Plan 2016' as shown below:

1. Green Belt would be lost

I object to the proposed loss of Green Belt. There are no special circumstances for the removal of the Green Belt, particularly in the areas of Send, Ripley and Clandon.

1. Over-large sites in rural locations

The inclusion of over-large housing, industrial and warehouse developments in the plan, such as Garlick's Arch, would have a detrimental impact on the villages of Send and Ripley and the local community. I object to the allocation of land to the Garlick's Arch development as it would have a detrimental impact on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9813  Respondent: 15466209 / Janet Parry-Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt would be lost

I object to the proposed loss of Green Belt. There are no special circumstances for the removal of the Green Belt, particularly in the areas of Send, Ripley and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8434   Respondent: 15466209 / Janet Parry-Morris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Late additions to the Local Plan

I object to the late additions of parts of the local plan, some with less than two-weeks notice. I'm particularly concerned about the Garlick's Arch addition and the new A3/Burnt Common junction. These will have considerable local impact and seem to have been introduced with no prior notification or consultation.

2) Development concentrated in one area of the Borough

A large part of the proposed new housing is concentrated between the M25 and Burpham. I object to the over-concentration of the proposed development in this one area, and its effect on the local community.

3) Limited consultation period

I object to the limited consultation period for the Guildford Local Plan. Everyone would have benefitted from a longer period of consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9818   Respondent: 15466209 / Janet Parry-Morris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1309  Respondent:  15466209 / Janet Parry-Morris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Limited consultation period

I object to the limited consultation period for the Guildford Local Plan. Everyone would have benefitted from a longer period of consideration.

Late additions to the Local Plan

I object to the late additions of parts of the local plan, some with less than two-weeks notice. I’m particularly concerned about the Garlick’s Arch addition and the new A3/Burnt Common junction. These will have considerable local impact and seem to have been introduced with no prior notification or consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp173/84  Respondent:  15466209 / Janet Parry-Morris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the proposal to inset Send Business Park from Green Belt because: Further expansion or development at the location detracts from the Green Belt openness. Access for vehicles along Tannery Lane would be restricted in both directions.

Yours faithfully

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposed developments. The infrastructure at present is groaning under the weight it has to bear and little or no thought has been given to the further needs that will be created by this plan. Small villages have small and narrow roads which were not designed to accommodate the high volume of traffic which will undoubtedly follow if this plan were to go ahead.

I wish these comments to be seen by the inspector

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal to remove Send, Ripley and Clandon amongst other villages from the Green Belt. Once started the destruction of the Green Belt will not stop. Once gone its gone and GBC will have free reign to convert this green and pleasant land into a high building plot. To my mind this is an act of vandalism by the GBC planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PROPOSED HOUSING DEVELOPMENTS

In my experience here and overseas requisite infrastructural requirements must be established before any new housing developments are undertaken. Anyone who cares to get up early enough to look at traffic congestion in this area will observe that the A3 is practically gridlocked each side of the M25 intersection at least twice per day and I would estimate that the A3 now operates at something very close to its maximum capacity. In consequence, the additional housing proposed in your plan will produce a catastrophic effect upon local traffic movements. Ripley High Street itself is extremely congested during peak periods and the proposed Wisley Airfield Housing Development will make this situation intolerable. There appears to be no provision for education facilities to serve the new developments: already Ripley children are being taken by taxi to schools as far away as Addlestone as secondary schooling in the area can no longer cope.

I could go on and on but will leave it there in the hope that the point will be taken that in addition to environmental concerns, the current infrastructure is at full capacity (or worse) and cannot possibly cope with the developments reflected in your plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8451  Respondent: 15466369 / D J Crowley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. GREEN BELT

Others far more articulate and knowledgeable than I have raised their objections to Ripley being removed from the Green Belt. I support and endorse their arguments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2015  Respondent: 15466433 / Caspar Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local plan has suggested a 35% increase in housing for West Horsley by 2022 and only 11% for Guildford town.

The village has no shops, no post office, no petrol station, no train station, no medical centre and a very limited bus service. It also offers no employment opportunities for residents. The national planning policy framework requires that new residential development must be limited in quantity by the availability of infrastructure and local facilities- this policy has been ignored in the Local plan.

The density of houses on the proposed sites is completely out of keeping with the rest of the village and will change the character of the village forever. The national Planning policy framework requires that new residential development must respect the character and density of housing in the area- this policy has been ignored in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/3953 | Respondent: 15466433 / Caspar Walker | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This new site will totally destroy the character of West Horsley. West Horsley is a rural village and one of its main features is that on the entry roads to the village (mainly long reach in this instance) there is a vista across fields as there is only development on one side of the road. These fields do not abut the currently defined village settlement on any side and so cannot be considered an extension of the settlement or infill at all. I cannot understand why this piece of land would have been picked for development at all as it does not satisfy any of the criteria for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8456 | Respondent: 15466433 / Caspar Walker | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
There is no explanation as to why West Horsley has been chosen to be removed from the Green Belt and no justification for doing so. The local plan states the "we will continue to protect the metropolitan Green Belt" yet the local plan is taking West Horsley out of the Green Belt. West Horsely is a distinctive rural village and its green belt status is essential to ensuring the character of the village remains.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2016  Respondent: 15466657 / Yvonne Farmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On personal note I am concerned about site allocation A29 - Specifically parcel of land directly to the north of field way, Tongham

My concern is that if property is built in this vicinity I will lose privacy to my home and garden area. I would also like to see TPO’s placed on trees bordering my property.

General concerns on large number of additional properties within Ash and Tongham area. Presently Tongham has a good community spirit feel that Tongham will become part of a large conurbation with Ash / Ash Green and Ash Vale. Understand need for additional housing but at what cost to us and future generations in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3955  Respondent: 15466721 / Mark Andrew Alder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3956  Respondent: 15466753 / G Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4866  Respondent: 15466753 / G Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

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<th>Respondent: 15466849 / R G Evans Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/3962</th>
<th>Respondent: 15466913 / David Wright Agent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/872  Respondent: 15466913 / David Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2021  Respondent: 15466945 / A M Wagstaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6. I object to the fact that there is no immediate provision for additional local school facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2020  Respondent: 15466945 / A M Wagstaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of evidence that this development is needed in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8460  Respondent: 15466945 / A M Wagstaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of evidence that this development is needed in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8461  Respondent: 15466945 / A M Wagstaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

1. I object to any erosion of the Green Belt. It continues to serve the local community and the country. I believe it is clear that irrevocable decisions taken to meet short-term objectives can be disastrous in the long term.

1. I specifically object to removal of the villages in and around Sendmarsh from the Green Belt. This area is already well developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. I object to the large amount of development in this one area of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I attach a letter of my objections to the 2016 Draft Local Plan. For your information, I have copied my objections as follows:

I am writing to you to voice my objections to this plan. I have lived in the Borough for 27 years, and have never before taken this step, but I am extremely concerned on a number of issues.

1. I object to the fact that this very short consultative period. This is being rushed. It has become clear in recent weeks that insufficient consultation can lead to catastrophically bad decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the fact that, even with such a short consultation period, new development sites were included with only 2 weeks’ notice.

I request that this plan be withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3965  Respondent: 15466977 / Posy Noble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3966  Respondent: 15467009 / Peter Morley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3967  Respondent: 15467041 / Robert Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: pslp172/4948  Respondent: 15467041 / Robert Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/3968  Respondent:  15467073 / Luke Romaine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/3970  Respondent:  15467137 / Simon Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/3972  Respondent:  15467201 / Shannon Burfoot  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/8463  Respondent:  15467905 / C J Reina  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have lived in Burpham since March 1988 (over 28 years) and there have been a number of new builds more recently, the Aldi store all of which have led to the over loading of the roads making communications problematic to say the least. At peak times (morning and evening), the roads are gridlocked and congestion throughout the day is apparent, particularly since Aldi opened in November 2015. Burpham Lane is used as a ‘short cut’ by traffic accessing the A3. With a primary school situated just off Burpham Lane and children/young mothers walking to and from the school; this creates risks and makes accidents waiting to happen even more likely. The roads around the village area of Burpham are narrow and there is no space to alter the access roads. Already Burpham is no longer the pleasant rural area it was and crossing the road on foot is positively dangerous for all ages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8464  Respondent: 15467905 / C J Reina  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new homes and developments proposed on sites at Gosden Hill Farm, Blackwell Farm, Wisley, Slyfield etc, plus the destruction of village communities (currently situated in the Green Belt) will only add to the already overloaded access roads. Road traffic travelling towards the town centre and A3 southbound from Burpham is already being forced to divert via the Weylea Farm estate to avoid congestion on the London Road through Burpham. Even London Road adjacent to Stoke Park and Guildford By-Pass are already congested and reaching saturation point - and this is before any further development has occurred.

Road users are already impatient and stressed by the infamous congestion on the M25, I believe that development on the site proposed will result in unacceptable chaos and traffic jams would inevitably lengthen and increase not only on the M25 but also the A3 in both directions. Any accidents occurring on both these major roads and on the access roads would be extremely difficult for emergency response vehicles to deal with.

I urge the Council to re-think both the size and the location of the proposed developments.

It will be too late once the houses are built. Thinking ahead concerning infrastructure is vital. Lessons must be learned from the disasters associated with the Aldi store development. Clearly the limited road access to and from the store was not taken in to account when Planning Permission was granted and this is a relatively small development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8462  Respondent: 15467905 / C J Reina  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
| Comment ID: PSLPP16/8477 | Respondent: 15468065 / Robert Medhurst | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the 2016 Draft Local Plan.

I was horrified and dismayed to hear of the Council's plans to build such huge numbers of houses/developments, particularly between Burpham (and next to Burpham) and the M25 for the following reasons:-

- Loss of Green Belt.
- Disproportionate level of development in one area of the Borough.
- Limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8476 | Respondent: 15468065 / Robert Medhurst | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

How can the current health service deal with the influx of extra people without serious effects and longer waiting times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
At present Send consists of many narrow roads surrounded by many fields and wooded areas where people cycle, walk, run, bird watch and exercise dogs. The proposed developments would make these activities cease, because of the dangers from traffic which would increase dramatically with the proposed housing developments. We regularly see new development with inadequate parking, the only realistic expectation is two cars per household will be added to our local road system. Also we have seen lorry traffic has increased many times over the last two years and it would increase even more during the housing developments on roads that are already in a poor state of repair.

All of the proposed projects would have a dramatic effect on traffic levels and pollution on major roads such as the M25 and the A3 and then filtering down to the country lanes which cannot deal with the volume and potential danger of excessive traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8475  Respondent: 15468065 / Robert Medhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our community has been made aware of the forthcoming proposals to remove large areas around Send from green belt. I wish to object to this proposal as this the only protection against indiscriminate building taking place, supported by greedy land owners. I thought there was a promise to protect green belt by the government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2022  Respondent: 15468097 / Allan Hempstead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/3977  Respondent: 15468097 / Allan Hempstead  Agent: |
|---------------|--------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| ** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) |
| This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/8480  Respondent: 15468097 / Allan Hempstead  Agent: |
|---------------|--------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| ** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) |
| This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/8484  Respondent: 15468097 / Allan Hempstead  Agent: |
|---------------|--------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8485  Respondent: 15468097 / Allan Hempstead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8483  Respondent: 15468097 / Allan Hempstead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8478</th>
<th>Respondent: 15468097 / Allan Hempstead</th>
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** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3980  Respondent: 15468161 / Jane Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3981  Respondent: 15468161 / Jane Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1719 of 2543
** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
**I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)**

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**I object to poor air quality concerns (Policy 13)**

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2024  Respondent: 15468193 / Juliet Soley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to voice my grave concern for the proposed housing developments taking place around The Horsley’s. I am totally opposed to the village’s removal from the Green Belt by insetting and extending the 003 Local Plan Settlement Area boundaries. est Horsley Parish is one of a rich and varied mix of all established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors through the seasons each year. This added to your proposed circa 3,000 additional houses ill ensure the Village infrastructure falls apart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8493  Respondent: 15468193 / Juliet Soley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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There have been no sound reasons given for the proposed changes which seem to be aimed solely at increasing land available within the settlements for future additional development. The local schools are already full and if there are any spaces available it would be one or to not 1000 or more! The Medical facilities are stretched. Drainage is inadequate and roads and car parks are overloaded with little or no scope for improvements.

without a doubt your proposed plans are going to ruin the local villages, the infrastructure on’t be able to cope and the scale of increase has alarming results (up to 35% in existing west Horsley households - greater than any other single area in the Borough).
I sincerely hope you will reconsider your plans that are going to have a detrimental effect on the hole borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2029  Respondent: 15468353 / David Collett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

New Local Plan

I have seen the new local plan and have several objections to lodge with you

I think you are planning to build too many new homes in both West and East Horsley. Our roads will not cope with the additional traffic, all our local services such as schools, the Doctors' Surgery and our shops have insufficient space for parking now and will not cope with any increase. This, of course. This, of course, also applies to the railway station.

Our local schools and medical services are already running at full capacity and would not be able to service the additional population I think you probably plan on building additional schools and medical centres to deal with this problem but, as no indication is given in your plan. I can only assume this would require you to build on yet more green field sites. This think is quite unacceptable.

Maybe a reduced number of homes behind existing housing would be acceptable but particularly object to plans to build housing estates along the roads through the village. This will alter the look: of our village and produce something that simply looks like a suburb of Guildford.

I would like also mention that the local facilities for dealing with sewage are already Under pressure. Where on earth is all the extra human waste going to be dealt with? Will this require yet more building over open spaces?

Finally but most importantly I object to your proposals to take our two villages of East and West Horsley out of the protection of the "Green Belt". This is a rural area and should remain so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3994  Respondent: 15468417 / A B Buchanan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
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<th>Comment ID: PSLPS16/3995</th>
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I object to the development at Garlick’s Arch. The land is Green Belt and there are no 'exceptional circumstances' which would justify this use of Green Belt land. It is inappropriate, unjustified, and represents an over intensive development on Green Belt.

There are far more appropriate brown field sites nearby for the industrial development (should it be required) and meet housing needs without plundering Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposal to build a 4 way interchange on the A3 at Burnt Common which will hugely increase traffic congestion in our village. All the Woking bowid traffic from the M25 and A3 will have to use minor roads through the heart of the Village and will be disastrous for our neighbourhood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Plan since Guildford Borough Council have repeatedly changed the proposals at short notice with no consultation and scant regard for the well-being of the local residents.

2. I object to the poorly thought out Plan which Guildford Borough Council propose as you fail to provide evidence to justify the need for the industrial space and the The statistics are flawed and are used to exaggerate the need. An increase in the number of foreign students is no justification to grossly increase the housing in Send. There is no evidence to support the need for this huge increase in housing and industrial development and there are plenty of brown field sites available to meet the required need.

1. I object to the significant industrial development which is inappropriate in the heart of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** Comment ID: PSLPA16/2031  Respondent: 15468609 / Lesley Lane  Agent:

** Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

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** Comment ID: PSLPS16/3992  Respondent: 15468609 / Lesley Lane  Agent:

** Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council’s own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the Draft Local Plan Infrastructure schedule does not provide for this site at all.

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlick's Arch site (A43) proposal, and the loss of green space and amenity

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3993  Respondent: 15468609 / Lesley Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8501  Respondent: 15468609 / Lesley Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

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I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

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Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8502  Respondent: 15468609 / Lesley Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8508  Respondent: 15468673 / Claire Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There are already travelling home sites in Normandy and 6 more would be excessive to the area.

I disagree that the area needs more homes and the loss of country side and use of green belt will be detriment to the area, which is currently a small village location. We already have community facilities in Glaziers Lane and with Normandy cricket and tennis Clubs which serve the area and a secondary school is not required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8507  Respondent: 15468673 / Claire Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash and Tongham (policies A27 A28 A29) Normandy (policy A46)

I am writing to object to the above mentioned policies.

I live in Upper Pinewood Road Ash which is betwix both mentioned plans.

The roads in the area are already struggling to cope with traffic which in the rush hour back up in both directions. There have been accidents requiring air ambulances at Harper's Road which is heavily used. Many houses along the Aldershot Road do not have parking with our Road an unadopted unmade road heavily used by persons not living in it causing congestion and at least 2 dumped cars are present at the moment. The rail crossing backs up heavily at peak times.

I drive a Half hour journey to and from work and the only place I get held up is five minutes from my home between the lights at the junction of the Aldershot/Pirbright Roads and my home due to traffic and the level crossing.

Our water supply struggles with low pressure and with more houses in the area I believe south east water do not have the infrastructure to supply more homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4000  Respondent: 15468705 / Pauline East  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the building of another 45 houses at Clockbarn Nursery as Tannery Lane cannot take anymore traffic and the junction with Send Road is already dangerous and will be made much worse. Already planning permission has been given for 64 apartments and a marina which is going to generate additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3998  Respondent: 15468705 / Pauline East  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses and 7000sq metres of industrial space at Garlicks Arch. This was sprung on the village at the last moment, only 2 weeks notice and without any prior consultation.

The infrastructure requirements have not been properly considered and are inadequate to deal with the proposed housing levels. Our roads, doctors and schools will be unable to cope. Industrial space is not needed and if it was could be accommodated on the Slyfield industrial estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3999  Respondent: 15468705 / Pauline East  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common, this would be disastrous for Send and the A247 which is already overloaded and jammed at peak times will become gridlocked. Already noise and pollution levels are excessive and this would certainly worsen to the point of being intolerable.

Send would be taking traffic from the proposed new houses at Wisley, Gosden Hill, Burpham and Blackwell Farm. Much of it would come through the village to and from the A3, M25, Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPS16/4001</th>
<th>Respondent: 15468705 / Pauline East</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the development of 40 houses and 2 travellers pitches at Send Hill there is insufficient access and it would spoil a high amenity area in beautiful countryside.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposed removal of Send from the green belt area and to all proposals to build on green belt at Send and elsewhere in the borough when there are adequate brownfield areas to accommodate what is really needed.</td>
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<td>Attached documents:</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because it's an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation and vehicle access is restricted in both directions along Tannery Lane. Expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3657  Respondent: 15468705 / Pauline East  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane because an increase to 60 homes is just too big for this area it will make surface water flooding which is already bad in this area even worse and will worsen access and traffic problems in Tannery Lane and at the A247 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3658  Respondent: 15468705 / Pauline East  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick,s Arch because it ignores all the thousands of previous objections made by local people, this is a beautiful permanent Green Belt area and the number of houses proposed is excessive and increased traffic will block up the local roads of Send and Ripley. Also there is no proven demand for Traveller Showpeople plots in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A58 at Burnt Common because it was previously deleted from the 2014 draft because of all the objections made at the time and there is no need to build an industrial site in the middle of Green Belt when Slyfield and Guildford still have empty sites and industrial units. Such a development will further impact the surrounding roads and environment, creating traffic congestion, noise and pollution issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy Land West of Winds Ridge and Send Hill – I am horrified to see this included in the plan.

1. It's NOT included in the regulation 18 draft and has NOT been consulted upon previ
2. Housing development is not lawful due to this area's permanent Green Belt status and high quality countryside which is much loved by dog walkers, children and local
3. The narrow width single track lane cannot cope with HGV lorries and vans and particularly will not provide access for mobile homes units. This lane is very much appreciated by local residents.
4. Send Hill, by its nature, provides a much loved country environment, it would be a catastrophe if Guildford Borough Council decide to wipe this out by placing traveller pitches and housing in this area.
5. The proposed change to this recreational area will damage local wildlife including owls, pheasants, deer, geese, foxes and bi

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/8510  
**Respondent:** 15468769 / David Turner  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. POLICY P2. Send should not be taken out of the Green Belt. Send provides green space between Woking and Guildford.
   1. Send is a much loved village which actively encourages village
   2. It has strong historic links to the local area including Henry VIII, Sir Francis Drake, one of the oldest churches in the country as well as its links to neighbouring historic Ripley.
   3. There is outstanding countryside in Send and its surrounding areas including country lanes and peaceful Wey Navigation
   4. It would be a huge loss to erode our much loved village by taking it out of its Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Comment ID: SQLP16/1214  
**Respondent:** 15468769 / David Turner  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Guildford Borough Council have not followed correct process. I strongly feel the council has totally disregarded resident views. The 2014 proposal for 430 houses went down in April 2016 to 185 and now I see it has gone up again to 485. These huge changes should go to full consultation under Regulation 18, not the shortcut of Regulation 19! This makes a mockery of the whole process.

It is very upsetting for our community that GBC are considering the above, I do hope that consideration will be made to the outstanding beauty of our countryside, our historic links and our wildlife and that our Green Belt protection is upheld.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3. The lack of proper infrastructure planning for sites (Policy P1)

There are no adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43). There are no plans to improve the capability of the medical, emergency and other services to cover the proposed developments.

I wish the above objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. Removal of Green Belt (Policy P2)

There are no exceptional circumstances for the above mentioned sites being removed from the Green Belt, as required by the National Planning Policy.

Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I have known and visited the Ripley area for 40 years and object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) on the following grounds.

1. **The development proposed is not sustainable (Policy S1)**

13,860 new houses will damage local communities by over development, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services and the local roads will not be able to cope with the additional traffic. The Plan has nothing to improve the infrastructure for the Garlick's Arch area. The Plan takes no account of the effects of the recent referendum which rejected UK membership of the EU any may reduce the demand for new housing in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I utterly object to building 45 houses at Cockbarn nursery. There will be inadequate access and vastly increased traffic volumes, without mentioning the likely increased volumes of traffic for Woking station which already boasts some of the most busy rush hour services in the country (this applies to all the proposed development). The junction with send road is already very dangerous for cars and lorries trying to join the main road. This will be on top of the previous planning permission granted at the tannery and the marina which will themselves greatly increase traffic volumes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/4008</th>
<th>Respondent: 15468833 / Zoe Kollov</th>
<th>Agent:</th>
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I vehemently object to building 400 houses and 7000 sq meters of industrial space at Garlicks Arch. I have just moved away from the Slyfield industrial estate to an area that I am assured by law cannot be touched for such purposes. We have paid a very hefty premium for the privilege of living in such a place, and will continue to pay the mortgage for many, many years to come. The site floods and is also ancient woodland that needs protection for the generations to come. If industrial space is needed it should be cited with the existing in Slyfield where we have just moved away from. We have been shown no calculations of Guildford housing requirement calculations so there is no basis to plan for the huge number of addition houses being suggested. I also object to the accelerated way these proposals were pushed forward with the hope of the local community not having time to Object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/4006</th>
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Finally, I could not object more to the proposed new interchange with the A3, which will see Send taking additional traffic from a large number of additional site containing approximately 2000 new houses (at Wisley Airfield, Gosden hill, Burpham, Blackwell farm). This would lead to a large proportion of the traffic for Guildford, Woking, the A3 and the M25 going through Send, which is not acceptable. We cannot have roads that are already fully loaded and necessary for the health and prosperity of the community gridlocked by this addition traffic, this is a green belt area, not a rat run.

The Green Belt is protection in law and there are no special circumstances why this should change in any way. Hands off the nations Green belt!!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I completely object to the development of 40 houses and 2 travellers pitches at Send hill. The roads are not appropriate to take further traffic due to the twisty tight nature and single width providing dangerous access. There is also unsafe landfill below the site. There must be brownfield sites that can accommodate such requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8514  Respondent: 15468833 / Zoe Kollov  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Send village being removed from the green belt. I have only moved in less than a year ago to Send, having moved out of Bellfields in Guildford. The reason my family and I have moved here is precisely for the reason that it is in the green belt and therefore by law is protected and should remain in its current state and free from further development. The green belt was intended to be permanent protection by law to ensure we do not hand over an overdeveloped sprawling mega city to our children, the countryside must remain and there is no special circumstance in this case why the law should be ignored. Local councillors and central government have given clear election promises to always protect the green belt, no matter what and this is a complete retraction of the promises and policies that lead to election.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/13  Respondent: 15468833 / Zoe Kollov  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business park from the green belt because;
- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- It is an areas of outstanding beauty and is quite rightly protected as green belt that would be completely destroyed by this change
- there is no exceptional circumstance why the current green belt allocation should be changed for this purpose
Please take every one of these objections into consideration for the local plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/249  Respondent: 15468833 / Zoe Kollov  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 change at Garlicks Arch because:
- I do not see any exceptional circumstances that should force the erosion of green belt land
- It will remove the ‘green belt’ between Ripley and Send that is necessary for the survival of our native species such as Hedgehogs
- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- A further 400 homes will put further pressure on local services, which are currently at breaking point; transportation, hospitals, education etc.
- There is no proven requirement for travelling show people plots
- It will spoil the current beauty and openness of the area, which is what attracted my family and I in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/250  Respondent: 15468833 / Zoe Kollov  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A58 at Burnt common because;

- It was deleted from the 2014 draft because of all of the previous objections so I cannot understand why it has now been included again

- Industrial and warehousing could not be further from the idea of protected greenbelt land, Slyfield would be the obvious choice for such purposes as it already have the infrastructure and a grouping of similar businesses. This is not a good reason to irrevocably damage our Green Belt.

- I would like to leave my house in the future to my children and I want it to be surrounded by Green Belt land as it is now including all the nature that encompasses

- The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that point there has been a decline in the demand for such industrial land

- The 2017 Employment land Need assessment shows a reduction in demand to 3.9 hectares, rather than the massively inflated 10 hectares in send on the green belt

- It will join up existing villages and defeat the purpose of the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 15468929 / Matt Shepstone</th>
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Policy a21 - support

I would like to state my support of this policy of retaining the land for Allotment use.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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</table>
I am writing to object to the proposed development on land west of Winds Ridge and Send Hill in Send, Surrey on the following grounds:

1) Very dangerous access from Potters lane.

I have lived in Church lane for nearly 30 years and use this junction everyday. Personally, I always turn left as I approach Potters lane from Send Hill. It is extremely dangerous to either turn right or to cross straight over to Church lane. If traffic increases due to the proposed development then a fatal accident is surely inevitable.

2) New Proposal.

This policy A44 appears to be a new site proposal that has not been consulted upon previously. I cannot think of a less appropriate site given the narrow and dangerous access to the whole site and if it had been consulted fully then I am sure that the inadequacy of the access would have been self evident.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4020  **Respondent:** 15468993 / Nicholas Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the building of 45 houses at Clockbarn Nursery. Tannery Lane is already a dangerous road which is very narrow. Coupled with planning for the marina and appartments this road will be overloaded and the junction with Send Road made even more hazardous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4019  **Respondent:** 15468993 / Nicholas Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I would like to voice my objections as a Send resident to the following elements of the local plan:

I OBJECT to the building of 400 houses at Garlick's Arch along with the proposed 7000 meters of industrial space. This is a site that floods and the calculations for the need such a large housing development has to my knowledge not been disclosed. This is a new site and was not included in the Regulation 18 draft and has not been consulted on previously. The local infrastructure cannot support such an increase in local residents. Overstretched schools and medical centre will not be able to cope with such developments.

Slyfield offers a much better site for industrial development - if needed at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT to the proposed new interchange with the A3 at Burnt Common.

The previously mentioned Send Road is already overloaded at peak times and this proposal will increase traffic levels along with noise and pollution. The traffic that currently goes through Ripley at the moment will now funnel through Send - this is unacceptable. 2000 proposed homes at Wisley coupled with 2000 at Burpham will cause chaos. Gridlock through Send will follow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15468993 / Nicholas Brown</th>
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1. I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. Unsafe landfill presently occupies the site and access is along a narrow single width access road. This is not an appropriate site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8520  Respondent: 15468993 / Nicholas Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Send village being removed from the Green Belt. This is my strongest objection. We moved to Send 20 years ago because it was green belt and is in a rural setting between conurbations. The goal posts have been moved to accommodate all the above proposed development. It is a cynical move which must be resisted - the Green Belt was intended to be permanent and was pledged to be protected by local councillors and central government. What has happened to this election committment? In fill development will be rampant if the area was to lose its green field status.

I trust that these objections will be duly noted by the Planning Inspector and the appropriate action taken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/138  Respondent: 15468993 / Nicholas Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send seems to have been singled out for development whilst other outlying villages have had there planning proposals rejected/cancelled - why is this? It means that the residents of Ripley, but especially Send, are being faced with a disproportionate level of development and change. Despite Send raising a large proportion of the total 32,000 objections to the 2016 plan it does appear that as a village community we are not being taken seriously and this will inevitably result in disillusionment with the whole planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/1402  Respondent: 15468993 / Nicholas Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

a) Access is already poor with Tannery Lane being far too narrow to accommodate the proposed increase in housing. Access onto Send Road (A247) is dangerous with vehicles often parked on the kerbs adjacent to the junction. The other direction along Tannery Lane is single track in places. Any increase in car numbers is going to exacerbate these problems.

b) A proposed increase of 33% is far too much (45 homes was already pushing the limits)

c) This proposal seems to ignore all previous local objections - why is this so?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1404  Respondent: 15468993 / Nicholas Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because:

a) It will link Ripley and Send with no green buffer between the 2 villages.

b) Again there is no consideration of the thousands of previous objections to this proposal from local residents and the increase in numbers of houses to 400 is massively excessive

c) It is an inappropriate site on account of frequent flooding and it represents a rare piece of ancient woodland which should be conserved and not destroyed.

d) Excessive traffic will again be generated on the Old Portsmouth Road which is already very busy (especially when there is a blockage on the A3). Ripley and Send come to a standstill with the current overflow traffic form the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1405  Respondent: 15468993 / Nicholas Brown  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:

a) It was deleted from the 2014 draft because of all the objections made previously.

b) Why not develop Slyfield where there are empty industrial units rather than build on Green Belt?

c) I understand that the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not an over allocation of 10 hectares at Send in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8524  Respondent: 15469089 / Elaine Myers  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the

Garlick Arch

Wisley

Gosden Hill

plan to remove these area from green belt.

If we give in and except building on green belt land there will be no stopping and no lovely open land would be left.

The increase in traffic on the A3 must also be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2038  Respondent: 15469185 / Pamela Crane  Agent:
I refer to your proposal to build approximately 485 new houses in two new sites in the Send area.

I strongly object on the grounds that the proposed sites are not suitable and their impact on the existing environment is inappropriate. The pressures on the roads, education, health facilities and council services, including policing, are unsustainable.

There are more appropriate brown sites and other sites especially south of Guildford.

I also strongly object to taking Send out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

On a more general note, you should add the following reasons for objecting to all of the identified proposals;

1. The council has failed to plan and identify sufficient Brown Field sites to accommodate development.
2. I believe their decisions may have been influenced by potential developers anxious to maximise profitability at the detriment of local people.
3. The council's forecasts are unrealistic and unreliable.
4. Several areas are subject to flooding and the increased effects of climate change need to be taken into account.
5. Impact on local services - insufficient infrastructure eg local schools, already stretched medical services (one can wait 2 weeks for a non urgent appointment now), transport needs to be improved
6. Huge increase in traffic and damage to the environments. Existing road networks unable to cope. Proposed additional access points to the A3 will only exacerbate problems.
7. The Green Belt must be protected. Government and Councilors gave election undertakings to preserve it, therefore the council are in breach of that undertaking. They should consult their constituents on such a significant matter which will undoubtedley effect us all.
8. If the Green Belt is removed - it will be deemed the go ahead for future development which could result in the urbanisation of our villages. Such destruction to our countryside is untenable. Once it starts it will be irreversible and permanent. I urge the councilors to think again. Surely, they do not wish to alienate the majority of villagers in Guildford borough? As I have yet to meet anybody who supports these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed 2000 houses at the Wisley Airfield site on the grounds that it is a totally inappropriate use of Green Belt and agricultural land. The location is served by country roads and to develop the infrastructure to accommodate access to the A3 will severely impact on the already congested and often gridlocked carriageway and also cause tailbacks to the surrounding country road networks. Drivers will no doubt use these as a 'rat run' and I suspect many accidents will occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to building 45 houses at Clockburn Nursery. Tannery Lane is a small, winding road which is prone to flooding in bad weather. It is hazardous and dangerous especially at the junction with Send Road. This makes it an unsuitable location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed 2000 houses at the Wisley Airfield site on the grounds that it is a totally inappropriate use of Green Belt and agricultural land. The location is served by country roads and to develop the infrastructure to accommodate access to the A3 will severely impact on the already congested and often gridlocked carriageway and also cause tailbacks to the surrounding country road networks. Drivers will no doubt use these as a 'rat run' and I suspect many accidents will occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and industrial space at Garlick's Arch. This area contains an ancient woodland and to develop it would be an environmental disaster effecting wildlife and destruction of many species. The area is prone to flooding which would increase, plus pollution. 400 houses has the potential for another 800 cars on the road and this coupled with lorries, vans etc to serve industrial units who would either travel through Ripley and Send, - a rush hour nightmare. This is turning our villages into urban areas and is contrary to Green Belt regulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4031  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new A3 interchange at Burnt Common - this would increase the congestion through Send which is already overloaded with traffic at a standstill particularly throughout the rush hour periods. Cars queuing in this way omit toxic pollution to local residents and pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4038  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of 40 houses and travellers’ pitches at Send Hill. This proposal is probably the most unsuitable of all has been ‘sneaked in’ at virtually the last minute as if it has little significance. WRONG. Send Hill is a beautiful country lane within the Green Belt much loved by environmentalists, residents, local people and visitors to the area. At weekends, many cyclists enjoy their recreation riding along here in a fairly safe, part single track road leading through to open countryside, the historic church and nearby river Wey. This lane cannot support increased traffic, has extremely limited parking and insufficient access for this development. The latter end of the road is very narrow approaching the junction with Potters Lane [this end was a private road although now adopted by the council. The residents however still own the subsoil]. The identified site is a landfill, with the subsoil contaminated with toxicity dangerous to health. It is also subject to surface flooding. If this site is disturbed, by building work and foundations being laid, not only will the housing be at risk, but has potential of increased surface flooding, spreading pollutants to existing properties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8536  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Is the Council going to set up Low Emission Zones to counter this and meet anti-pollution legislation? As an asthmatic who only recently moved to this area, I am seriously concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8532  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Where is your mandate for this?

Why have you not written to every resident asking for a Yes or No to these proposals? It will affect all of our lives and we deserve more of a say in it. That is democracy. Expecting residents to ‘go on line’ for more information about the revised Plan and public events as stated in your ‘About Guildford’ publication is not good enough. Not everyone has a computer and/or skills - particularly the elderly, who are therefore disadvantaged as a result.
I object to your presumptions that our villages no longer qualify for Green Belt status. This is totally wrong. The government’s practice guidelines on protecting Green Belt land, -copy attached- are very clear. Our villages meet the criteria of the five purposes in point 80 as follows:

1. To check the unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns merging into one another eg Woking/Send and/or Send/Burpham
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

All of these criteria still apply to our villages and should certainly NOT be set aside.

I object to your definition of housing needs based on spurious projections and calculations of presumed levels of population growth. The recent Brexit vote challenge your predictions as does the public desire for more 'controlled immigration'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8539  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. 9. Protecting Green Belt land

79 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping Land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80 Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

81 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

82 The general extent of Green Belts across the country is already established.

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
• set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2930  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockburn nursery site. Tannery Lane, Send
1 object to the increase of 15 houses (60 instead of the previous 45).
a) The site is prone to surface flooding.
b) The beautiful countryside of the Wey Navigation flora and fauna will be permanently damaged,
c) increase in traffic in Tannery Lane, a lovely narrow country lane, and particularly at the junction with the A247 which will become a dangerous area opposite The children's playing field.
d) There is no justification for the increase, ignoring hundreds of previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2931  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Land at Garlick's Arch. Send Marsh.
I object to the addition of eight travelling/show people pitches.
a) There is NO demand for these pitches in this area.
b) There is NO legal requirement for this provision - Guildfords's own 'drop-in event describes this provision as "Sui generis". Translated it means to hinillier a generous gesture.
c) The local plan policy states "Gypsy, traveller or travelling show people accommodation should only be provided on development sites of 500+ homes NOT 400
d) The council has ignored thousands of objections to the proposal for 400 houses on this site. The impact on both Ripley & Send in terms of traffic jams. insufficient intiastructure and services.
e) The site is Ancient woodland and permanent Green Belt of historical interest which should not be de-classified. There is NO justification that would meet the criteria of "Exceptional circumstances."
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2933  Respondent: 15469217 / L.Y. Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 Land at Burnt common, London Road.

I object to this proposal of minimum 7,000sqm floor space.

a) No Justification of change of criteria of floor space from "maximum to minimum". This will encourage future on-going development.

b) Slyfield and Guildford still have capacity - no need or demand identified to build industrial development on Green Belt land.

c) 2017 Employment Land Needs Assessment shows a reduction in demand, NOT an increase.

d) More traffic chaos, gridlock and pollution.

I also wish to state that I strongly object to the overall development proposals for Send Village. The plans are very disproportionate compared with other areas in the Guildford borough - some of which have been exempted in the updated version of the plan due to Green Belt and Natural Beauty. Send is also Green Belt and has several areas of Natural Beauty. Much of these plans will seriously impact on the lives of the residents, create traffic chaos and high pollution levels. Also, given the proposed A3 North/South double link interchange at Clandon Road, Send will become a suburb of Guildford. Guildford Council has ignored the views of thousands of people - residents, working people, environmentalists and other interested parties who have taken the time to write and express their views.

WHERE IS DEMOCRACY??

The Council planners should sit down with our Parish Council, Community leaders, residents and interested parties to work together to produce a fair and acceptable plan for Send - NOT impose this damaging plan that will significantly change our Village foreer.

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Comment ID: PSLPA16/2040  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2041  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4032  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4033  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4034  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8530  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8529  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8538  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that
order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8535  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8537  Respondent: 15469249 / Daniel Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8531  Respondent: 15469249 / Daniel Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8533   Respondent:  15469249 / Daniel Harris   Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8534  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8527  Respondent: 15469249 / Daniel Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Policy A44. 1.9ha Land west of Winds Ridge and Send Hill

I object to the proposed development on land west of Winds Ridge and Send Hill in Send, Surrey because I have lived in Church Lane, off Porters Lane for nearly 30 years and over this period there have been numerous accidents from vehicles coming down Send Hill into Potters Lane. Cars travel very fast along Potters Lane and there is a blind spot when turning right out of Send Hill, at Potters Lane. This has caused accidents. Evidence of accidents, apart from screeching breaks, is damage to the gate on the corner and hedges. Being aware of these facts I always turn left out of Send Hill and u-turn at Vicarage Lane to then enter Church Lane. If the proposed development goes ahead I fear that the heavier traffic is very likely to cause a death at that junction.

Send Hill is a narrow road at both ends. I therefore strongly object to the proposed buildings and travellers pitches west of Winds Ridge and Send Hill because of the danger of extra traffic on this narrow road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4035  Respondent: 15469441 / Peter Silnester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4039  Respondent: 15469601 / Drina Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Detected entities: Guildford

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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Detected entities: Guildford

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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15469793 / Louise Jones</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2043  Respondent: 15470017 / Jason Riley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to many areas regarding the above. As a resident of Send/Ripley I wish to make the following points:

- I object to all erosion of the Green Belt.
- I object to any "in-setting" of ANY villages from the Green Belt.
- I object the amount of development in one area of the borough.
- I object to the lack of immediate provision for Doctors Surgeries.
- I object to the limited consultation period.
- I object to the last minute inclusion of new sites with less than 2 weeks.

I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4051  Respondent: 15470049 / C Carr-White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2046  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2048  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.
However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4068  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore It does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100,82215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained, The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%,5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be .5km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/4072</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2)

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site (Policy 14).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1).

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4073  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Glandon and Burnt Common, This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8562  Respondent: 15470145 / Linda Eyre  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8557  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B1c) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very elsewhere which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8558  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floor space at Gartick's Arch -Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c,B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites. There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

1. To help make Guildford's river landscape less of a putting and support town break packages for high value. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8568  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 - Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g., Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of regulatory capture, by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g., by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provisions inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8592  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

IOBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e., normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all "(" historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8564  Respondent: 15470145 / Linda Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 3000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result at the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8567  Respondent: 15470145 / Linda Eyre  Agent:</th>
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1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. this will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8552  Respondent: 15470145 / Linda Eyre  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

/ The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the...
soil being heavy clay. Clearly the SFRA is not fit for pose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan. Please send me written confirmation that you have received this correspondence by writing to my address above.

1. **I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)**

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or on any common-sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4052  Respondent: 15470177 / M D Traynor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/705  Respondent: 15470177 / M D Traynor  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4053  Respondent: 15470209 / Paul Skinner  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1270  Respondent: 15470209 / Paul Skinner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4054  Respondent: 15470241 / D Roberto  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4055  Respondent: 15470273 / Danielle Hope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8544  Respondent: 15470305 / E C McQuade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Guildford councils plans because of the lack of infrastructure. I travel on the A3 London bound every morning and already have to allow extra time on my journey, leaving at 6.30am, to join the A3 at the Ockham Park junction due to an excessive weight of traffic for the M25 and A3. The proposal will substantially increase the number of cars to this already congested local road system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8545  Respondent: 15470305 / E C McQuade  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I currently have a field behind my house full of wildlife including deer and hundreds of year’s old oak trees. Even with this open space the ground in my garden has problems with slow drainage of surface water.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8546  Respondent: 15470305 / E C McQuade  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

From an internet search I have found that by definition the main purpose of the green belt policy is to protect the land around larger urban centres from urban sprawl by keeping land permanently open and maintain the designated area for forestry and agriculture as well as to provide habitat to wildlife. The essential characteristics of Green Belts are their openness and their permanence. How can it be ok or acceptable for Guildford council to dismiss this essential policy!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the Strategic Housing Market Assessment SHMA figure OF 693 houses per annum in the borough being too high.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling, so there is no transparency to this evidence base. This is undemocratic as those affected by the plan are unable to ascertain its accuracy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4080  Respondent: 15471489 / P Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery.
This is inadequate access to Tannery Lane which is narrow and has a dangerous junction with the busy A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4085  Respondent: 15471489 / P Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4082  Respondent: 15471489 / P Gilby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and two travellers pitches at Send Hill

Access is narrow, a blind junction at one end with potters lane at the bottom of a steep single lane hill. The other end of Send Hill is often congested with school traffic. The site is on an old landfill which is known to contain toxic waste. This is an inappropriate location in the quiet English countryside close to the final resting place of past residents of the Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/8621  Respondent: 15471489 / P Gilby  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development

The proposed development at Garlick’s Arch (A43) will impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

Because there are few buses, people living in the new development will need to use cars to get to work. They will either drive to work or to a station. In order to get to Woking station most will need to use the A247 through Send. The A247 is already heavily used. It turns sharply over the bridge across the Wey Canal into Broadmead, which is flood meadow land. At the end of Broadmead the A247 comes to a mini roundabout where it splits the traffic into Woking in two directions.

Any blockage to the road, by delivery lorries, road works, traffic lights or the frequent accidents that occur, results already in paralysis of both roads into and out of Woking, and also to traffic through Send. The road is not designed to take the current volume of traffic, let alone the huge traffic increase which will result from the development. Drivers trying to avoid the jams find that the rural roads in this area are narrow, single lane for the most part, in poor condition and have no footpaths. More houses will mean more dangerous and unsustainable traffic. It should also be noted that there is an antiquated main sewer running below the A247 which has collapsed in the past causing road closures and associated traffic chaos, any additional traffic will only increase loadings and vibration on this old sewer system leading to future blockages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8618  **Respondent:** 15471489 / P Gilby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. The Plan does not identify infrastructure improvements sufficient to support the huge development. Local services, school places and doctors, are already stretched. There will be need for huge sewerage, water and utility provision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8612  **Respondent:** 15471489 / P Gilby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 would need to be improved to cope with the increased capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. The A3 & M25 are already at capacity during peak hours, with horrendous jams frequently occurring, and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. I object to damage that will be done to local wildlife. The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas. The site has an abundance of wildlife, some of which are protected. The development of the site will result in the loss of habitat. I am not aware that any wildlife report has been conducted on the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to not protecting the Green Belt

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites 01 Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there needs to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages. Central government states that housing need is not an exceptional circumstance. There is a real danger that the loss of this Green Belt will result in urban sprawl and the loss of the individual character of each village, as neighbouring villages merge into one another. Land once taken from the Green Belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanent detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not have railway stations within easy walking distance and bus services across rural villages are few and far between. Greater consideration should be given to increasing the density of development in urban areas, like Guildford, where more practical sustainable transport is provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey. The three Wards of Lovelace, Send and Clandon & Horsley are rural wards representing about 11% of the existing housing in the borough. The allocation of sites in the Plan will result in 36% of all new housing being in this area. The allocation strategy adopted in the Plan is out of balance with disproportionate development in the north east of the borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>PSLPS16/4062</th>
<th>Respondent: 15471521 / Phillipa Chapman</th>
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<th>PSLPS16/4063</th>
<th>Respondent: 15471553 / L Y Robert</th>
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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.
Who is running this town!!!

University has too much power!

Shame on you!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4064  Respondent: 15471585 / Hilary Minor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: pslp172/5118  Respondent: 15471585 / Hilary Minor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Attached documents:

Comment ID: PSLPS16/4065  Respondent: 15471617 / Richard Lansdowne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4066  Respondent: 15471649 / Katarina Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

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<th>Respondent:</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/4981</th>
<th>Respondent:</th>
<th>15471873 / Lorraine Smith</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4070  Respondent: 15471905 / A J Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4071  Respondent: 15471937 / B Coppinger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2051  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2052  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.

However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4077  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, 82215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be .5km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/4078</th>
<th>Respondent: 15472097 / Bernard Eyre</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site (Policy I4).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4079  Respondent: 15472097 / Bernard Eyre  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Glandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8601  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8598  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mile of light industrial (B1c), general industrial (B1c) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8599  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the location for new employment floor space at Garlick's Arch= Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and BS) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8600  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and Identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make guildfords river landscape less of putting and support town break packages for high value. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8605  
Respondent: 15472097 / Bernard Eyre  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford)

insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of 

,regulatory capture;;by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to Improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over provisions inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8606  
Respondent: 15472097 / Bernard Eyre  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
19. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87- 89) fully applies, including the need to prove "exceptional circumstances ."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8602  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some SOOO houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan, The narrow rural roads do
not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of Improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8603  Respondent: 15472097 / Bernard Eyre  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A2S), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8604  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8596  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garrick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.

There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt &. Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8597  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the boroughs identified development needs. A Level 2 SFRA therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch {A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone i - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for pose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8594  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan. Please send me written confirmation that you have received this correspondence by writing to my address above.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8595  Respondent: 15472097 / Bernard Eyre  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop...
or study. On any common-sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/8610</th>
<th>Respondent: 15472705 / Mark Seager</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Will building 5 bedroom houses for the uberwealthy really help our younger generation get on to the property ladder. i don’t think so

Please give it more thought before you make our lives more difficult

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have real concerns and object strongly to guildford BC’s local housing plan 2016.

My reasoning is this has been badly thought out. I do not think that the local infrastructure has been properly considered and am concerned that the houses will be built quickly and the roads, sewage and local environment will have secondary importance and will only be dealt with after the houses have been built and the additional populous has arrived with their increase in traffic, and the new locals' educational needs and health issues only considered after the event.

All the proposed additional plans will not fit into the limited area without major upheaval to the current population. It takes me half an hour longer to travel to work than it did 10 years ago how much longer will it take in the future. The A3 is not just busy during rush hours filling up one way in the morning and the other way in the evening it is continuous both ways and the additional traffic will make it worse getting into Guildford at Ladymead or exiting at Burpham.

I live in Burpham and have to queue following 25-30 cars in the morning to get out of ‘New Inn Lane, how much worse will it be with all the additional houses you plan to build in the vicinity.

My doctors surgery Merrow Park is full to overflowing. It takes 2 weeks to get a doctor’s appointment currently. How much longer will it take in the future until you get a new clinic, if you ever do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8609  Respondent: 15472705 / Mark Seager  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Why build on green belt land when there are alternative Brown belt areas within 3-5 miles which can cope with this better. Please listen to GRA and local residents too before enforcing these change on us. We matter not just pandering to governments promises, after all we are the voters who put you in your current positions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2054  Respondent: 15472801 / Carmel Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I live in London but come to visit my grandparents in West Horsley as often as I can when I am on holiday. It is a lovely village and so peaceful to come to away from all the noise and traffic in Ealing where I live. I love to go walks with my cousins who also live in the village and see the horses in the fields. My Granddad and Grandma have told me that you want to build lots and lots of houses which will mean more cars and I think this will spoil the village which is really beautiful.

Where I live young people have plenty of things to do and there are tubes and buses which can take you where and when you want to go such as to friends, school, cinemas, shops clubs and other activities but West Horsley has hardly any buses and none at weekend. Have you thought what all the extra children who would come to live in West Horsley would do unless their parents had cars and would be prepared to take them to places where they wanted to go to? Also where would they go to school since my grandparents have told me that the school in the village is already full and so is the senior school in the next village.

I love to visit and enjoy being in the country, but if I had to come to live in this village after you had built all those extra houses then I do not think I would be very happy since there would not be much for me to do.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4089  Respondent: 15472833 / Lorraine Ozanne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the building of 45 houses at Clockbarn Nursery - the lane cannot take any more traffic and there is inadequate access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4091  Respondent: 15472833 / Lorraine Ozanne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the building of 400 houses and 7000 sq metres of industrial space at Garlick’s Arch – Slyfield is a better place for such industrial space. This Green belt site should not be needed if brownfield sites are properly used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4092  Respondent: 15472833 / Lorraine Ozanne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common – Send would not be able to manage to take the traffic and noise and pollution levels would be excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4090  Respondent: 15472833 / Lorraine Ozanne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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I object to the development of 40 houses and 2 travellers’ pitches at Send Hill – again there is insufficient access and this development would spoil the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/4093</th>
<th>Respondent: 15472865 / Anthony Pickford</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to Send village being removed from the Green Belt – it is essential that Send maintains its permanent Green Belt status to ensure the continued separation of Woking and Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to Guildford Borough Council's draft local plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hogs Back at Blackwell farm which will

1 destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
2 remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
3 increase tailbacks on the A31 and traffic congestion
4 result in rat-running through local roads
5 add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/866  Respondent: 15472865 / Anthony Pickford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2058  Respondent: 15472897 / Nola Armstrong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object MOST STRONGLY to any plan to move the current green belt boundary to exclude the fields behind Shalford Village Hall.

These fields should be retained within the current green belt boundary and kept outside the village settlement boundary.

The boundaries have been there for a long time so there is no valid reason for change.
If housing was allowed on this land it would dominate the village because of its elevation. It would also take away the open breathing space which is so valuable to the village's character. Access to this site for vehicles is utterly unsuitable and dangerous. It would be via Chinthurst Lane.

I have lived in the lane for almost forty years. It is extremely congested both with through traffic and parked (non-residential) cars. To consider more traffic is ludicrous and irresponsible.

I repeat that I object vehemently.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4104   Respondent: 15473025 / Tim McEwen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

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- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- add to Guildford's pollution.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4116  Respondent: 15473313 / J M Matthews  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4117  Respondent: 15473345 / Andrew Hampshire  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2068  Respondent: 15473473 / Gordon Prosser  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The result of any such proposals being carried thorough would result in the narrow roads in and around Send becoming total gridlock with much damage being done to the economy and the well being of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4118  Respondent: 15473473 / Gordon Prosser  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 in that the proposed industrial development of 7000 sq m is simply not required. In addition, any proposal to have a traffic interchange (4 way) onto the A3 at Burnt Common would lead to impossible numbers of HGV's etc, and Send is already overburdened with traffic from 6 am to 7 pm on weekdays.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4120   Respondent: 15473473 / Gordon Prosser   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44 - there has been no previous consultation on such a proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8635   Respondent: 15473473 / Gordon Prosser   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove Send from the Green Belt. To avoid one long conurbation, Send Needs to be a buffer between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8634   Respondent: 15473473 / Gordon Prosser   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposal to build 485 new homes as I understand that the use of regulation 19 is unlawful and full consideration requires Regulation 18</td>
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<tr>
<td>I object to the estimate that 13,800 homes are required and that the green belt would therefore be built on.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the planned development at clock barn nursery policy a42. There is insufficient infrastructure in this area. Specifically the road system. Send road cannot handle any more traffic. It is a major hazard and dangerous with the park opposite full of kids. Schools and doctors would appear to be also full to capacity. Use BROWN field sites and not greenbelt.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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</table>
I also object to the developments a43, a44, a43a for the same reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8638  Respondent: 15473729 / Barrie and Jenny Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also send should not be removed from the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4131  Respondent: 15473761 / Robert Drummond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals for Blackwell farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

The A31 is already a disaster due to its inability to cope with the traffic generated by local use, long distance use and the inability of the planners and authorities to build an adequate by-pass of Guildford. It has become a totally unsafe Road especially at the Eastern end of the Hogs Back due (not to its crossing points) but due to the static traffic at many times of the day backing up, due to inadequate signage, due to poor surfaces and due to the high speed drivers when it should have a 50mph limit or even less. The plans are also ignoring the likely increase of traffic from the proposed additional housing in Normandy, Ash and Aldershot. The planners are creating a situation that is turning a disaster into a nightmare by failing to consider the bigger picture. Many more lives will be lost and people injured unless plans are amended and designed to incorporate all the needs of both the local communities and the long distance travellers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly to the Guildford Borough Council’s Draft Local Plan June 2016 it is unsound for the following reasons:

Housing numbers

The proposed increase in house numbers in Burpham alone is 40% of the total proposed in the Draft Plan – this is a disproportionate amount and there should be a fair distribution around the whole of Guildford not just in one section. The Council has refused to provide details of how these numbers have been calculated and brings into question the true strength and reliability of these figures, as they cannot be independently verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Utilities

The sewage, water and electricity systems are at capacity in Burpham and these basic systems need to updated and improved in order to take the greater demand placed on it by more households.

It is not acceptable to do this once planning permission is approved it needs to be carried out beforehand to ensure that the existing residents of Burpham are not having to accept a reduction in services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport

Having lived in Burpham for many years, the congestion has steadily got worse until the opening of Aldi and then it got substantially worse – this was after many traffic surveys carried out by GBC during the planning process and proves how unreliable and unrealistic the current method of surveying is.

A realistic traffic solution must be put in place before any agreement is made on housing.

London Road is currently queueing solidly from the Spectrum roundabout to the A3 northbound constantly between the hours of 3.30pm and 6.30pm adding a bus lane and a cycle lane to this will result in more chaos and undoubtedly more accidents as there is not sufficient space.

I look forward to hearing from you that the Council has come to it’s senses and will revisit and amend this unsound plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2074  Respondent: 15474785 / Jules Widdowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The way in which the Plan uses the proposed increase in demand for skilled labour in Guildford as a justification for the number of new homes. Where the proposed increase in labour will come from is not substantiated. Indeed, the recent Brexit vote means that the projected numbers need to be revisited and most likely scaled back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4132  Respondent: 15474785 / Jules Widdowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The development of the former Wisley Airfield does not take into account the effect on the local villages whose infrastructure would have to support it. This will undeniably bring a further increase in road traffic on already busy roads. The train station and its commuter links cannot support that level of growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Horsley village infrastructure is already over loaded. For example, the local school is over capacity, as is the Doctors. The roads through the village are already so dangerous - Ockham Road, for example, has so many lorries, vans and cars that it has become too dangerous for me to walk, scoot or cycle the children to school. I see commuters, families and elderly stuck, waiting, in people's driveways on wet days - unable to make progress along the road as they get soaked by passing vehicles driving so close to the pavement and the overloaded gutters. The knock on effect on Ripley will also be disastrous - it's already very difficult to get through to Pyrford at peak times, with queues up Ripley High Street and down Ripley Lane. Similarly, getting onto Cobham High Street, the A3 at Cobham and Ockham and the M25 at peak times is incredibly hard already, and daily I see dangerous driving as people take risks to try and speed up their journey. More homes, more families, more elderly will further stretch these services and the infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposal to remove the Horsleys from the Green Belt. These villages should not be withdrawn from the Green Belt. They are village communities and to remove them from the Green Belt will make it easier to build new homes without regard to the sustainability of the village community and the limitations of its infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8646  Respondent: 15474785 / Jules Widdowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed number of homes to be built. Whilst I agree there is a need for new homes, the number of new homes proposed is not sustainable within the current villages and their limited infrastructure. The proposed developments A38, A39, A40 and A41 should not be granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2077  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2075  Respondent: 15474849 / Timothy Yorath  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for " However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the
thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almostcertainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances " existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondy I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/4152 **Respondent:** 15474849 / Timothy Yorath **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Glandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Glandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Glandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 -2014 from Crashmap data

- Glandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents 2015

2016

- 15 April 2016 12 year old boy injured in The Street - A247 closed in both directions
- 28 April 2016 A3 West Glandon London bound between A247 Tythebarns Lane, (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road. Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Glandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, 82215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the
developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Glandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/4153 | Respondent: | 15474849 / Timothy Yorath | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick's Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Glandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here. The A247 running south past this site through the centre of West Glandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for
southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians. The development will cause harm to the ancient woodland on and by the site. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford. Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016. Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site. National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3). If the stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4). This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3). The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4). It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1). Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a) The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send.

"Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/8676</th>
<th>Respondent:</th>
<th>15474849 / Timothy Yorath</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8696  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8697  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8663  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8666  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8671  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8718  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment /"Disneyfications". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8695  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion. The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8693  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

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It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand. In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will 'affordable homes' be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist. The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small. The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Glandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular pastime, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

I there is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch I (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans.

This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever.

Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions. Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth. In addition I OBJECT to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8660  Respondent: 15474849 / Timothy Yorath  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding. The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as I being in a
flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8655  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Glandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing.

Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8658  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it.
instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Glandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Glandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in
the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  SQLP16/1218  
Respondent:  15474849 / Timothy Yorath  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):  ( )

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents' Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  SQLP16/1219  
Respondent:  15474849 / Timothy Yorath  
Agent: 

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Page 1853 of 2543
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land. Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can
the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council's The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Glandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

16. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: SQLP16/1221</th>
<th>Respondent: 15474849 / Timothy Yorath</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<td>I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.</td>
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<td>This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.</td>
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<td>The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.</td>
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<td>Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.</td>
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<td>This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn. The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4775  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

13. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

14. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

15. Many of the affected villages, such as West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

17. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

18. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>pslp172/4776</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3201  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/648  Respondent: 15474849 / Timothy Yorath  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4140  Respondent: 15474913 / Victoria Huth  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to Guildford Borough Council's draft local plan proposals to build 1,800 houses and industrial park and a highway on the slopes of the Hogs Back at Blackwell farm which will:

- destroy views from the Hogs back ridge, an AONB
- remove 72 Ha of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4151  **Respondent:** 15475041 / Anne Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

I have major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

I strongly object to Policy A35 and will provide a more detailed submission outlining my arguments against this policy in a separate letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4148  **Respondent:** 15475041 / Anne Geary  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing.

I am concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), then I am broadly supportive of housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

Whilst we endorse many of the requirements set out in Policy A36, our principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

I would only support development at this location if it has a significantly lower housing density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4150  Respondent: 15475041 / Anne Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to us highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in ‘exceptional circumstances’. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, we consider these proposed movements in settlement boundaries to be invalid.
These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first ‘lines of defence’ against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I object to the site allocation policies A37, A38, A40 and A41.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it, I object to Policy A39.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8716  Respondent: 15475041 / Anne Geary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8717  Respondent: 15475041 / Anne Geary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. I fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8719  Respondent: 15475041 / Anne Geary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these
applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

I will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that I object strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

• as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;

• EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;

• EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;

• EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
• EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the

I object to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>I support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.</td>
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<td>I support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general policy statements made in this policy, which are mostly repeating NPPF polices. Our main concerns,
as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8703  Respondent: 15475041 / Anne Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the general principle that developers should be required to contribute part of their development profit towards the
cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly
inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This
has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the
borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not
exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the
parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing
built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the
affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of
affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the
strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places
where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious
inefficiency in the provision of social housing in the borough in an area such as East Horsley this is likely to be manifested
in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the
affordable sector.

In summary then, I object to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I support this policy.</td>
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<td>These three policies cover Infrastructure &amp; Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport. Whilst I support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which gives me cause for concern.</td>
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<td>I believe there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.</td>
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<td>I would make the following comments specifically about infrastructure in East Horsley today:</td>
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<td>• Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;</td>
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<td>• The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;</td>
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<td>• Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;</td>
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<td>• The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;</td>
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<td>• There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and</td>
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<td>• The Medical Centre in East Horsley is already at capacity in terms of its number of...</td>
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It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it

is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley’s.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

I accordingly object to the infrastructure proposals on these grounds. I further object to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8721  Respondent: 15475041 / Anne Geary  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8705  Respondent: 15475041 / Anne Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

I therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8706  Respondent: 15475041 / Anne Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* I fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:
a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt.

I therefore object to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

I object to this proposed boundary change.

1. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of
woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

I object to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe

the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

I object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/8707</th>
<th>Respondent:</th>
<th>15475041 / Anne Geary</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8708  Respondent: 15475041 / Anne Geary  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8709  Respondent: 15475041 / Anne Geary  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8699  Respondent: 15475041 / Anne Geary  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8698  Respondent: 15475041 / Anne Geary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ();

I have carefully reviewed the proposed Submission Local Plan which Guildford Borough Council has now published for public consultation. Please see my comments below.

I am concerned about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by Guildford Council.

I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I support this policy, but unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore object in the strongest possible terms to this plan.

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes
offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by myself, which unequivocally rejects GBC’s Forced Growth policy.

Therefore I object strongly to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2076  Respondent: 15475105 / Emily McDermott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to voice my objection to the proposals for Normandy and Flexford in the revised local plan.

The decisions regarding the need for schools is decided by Surrey County Council, who have not deemed another school in the area necessary. Moreover, local schools are currently undersubscribed, which is further evidence that building a new school in the area is completely unnecessary.

As a result, building on green belt land which exists, in part, to prevent rural areas from inappropriate development, is simply unjustifiable. The building of some 1100 houses, supposedly validated by the need for a school, would result in the destruction of rural land, ruining the village for the majority of its inhabitants. The school is not necessary, and to justify the building of the houses to fill the school is simply illogical. One of the purposes of the green belt is to prevent the merging together of villages, which is, in grouping Normandy and Flexford together, precisely what you are doing.
Furthermore, the new residences would provoke serious issues for current inhabitants of Normandy and Flexford; we already suffer major congestion issues in the morning which would be dramatically worsened by tripling the population of the area.

I suggest that the proposed plans for the area in the revised local plan be rejected, as they are a blatant infringement of the green belt requirements. The building has been justified by a supposed “need” for a school which simply does not exist.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/3682  **Respondent:** 15475105 / Emily McDermott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed plan to build new houses around the Normandy and Flexford area. To my knowledge the main reason this housing plan is even being considered is that there is supposedly a need for a new school. Not only has there already been development of a new school in Mayford – which is inside the catchment area – but all the local schools' head teachers have indicated that there is no need for a new school. In fact the school that is nearest to the announced site, the primary school Ash Manor is under-subscribed. Therefore the new school would only be filled – and probably only partially filled at that – by the new residents of the supposed housing plan. This means that there are absolutely no exceptional circumstances due to a necessity for a school.

As Normandy is located squarely inside the Green Belt, is it surrounded by Areas of Outstanding Natural Beauty as well as Sites of Special Scientific Interest. The areas specifically affected by the housing proposal consists of pastures, farmland, hedgerows, trees and grasslands. These support a wide variety of wildlife which keeps biodiversity high and the surrounding environment fertile. The Green Belt was established to reduce urban sprawl to have areas with clear air and natural beauty. It is explicitly stated that it requires exceptional circumstances to build on the Green Belt and, as I have previously explained, there are no exceptional circumstances in this situation.

The final point that has been brought up in an attempt to justify this housing plan is that more people are necessary to make Normandy a thriving village community. It already is a thriving community. We have a primary school, a nursery school, a surgery, a pharmacy. Attempting to triple the number of residents will only worsen community as it is simply creating an urban environment in a community based around its countryside. Adding to the numbers will increase traffic to unbearable levels; the Hog's Back already has terrible congestion in rush hour, and as the railway line severely limits the way new roads could be introduced between Glazier's Land and Westwood Lane, there will be no way to alleviate any of the traffic.

My final point is that the only way you have to fund these proposed plans is using public funds. The tax payers money should not be wasted on a housing plan that uses its own “potential” benefits to attempt to justify itself.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15475297 / Jane Patricia Chandler</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15475297 / Jane Patricia Chandler</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.
° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4154  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/8731  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/8728  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8729  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8730  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8732  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8733  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8723  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
My son and grand children live on The Street in West Clandon, [personal information redacted], and I visit on a weekly basis and stay for two days to look after my grandchildren. The Street is already a extremely busy and dangerous road with a narrow pavement and in places the road so narrow that trucks and buses have to mount the pavement to pass. I regularly walk my grandchildren along The Street to the recreation ground which is an unpleasant and dangerous experience and it is only a matter of time before there is a serious accident on this road. Furthermore the exit from my sons property is the completely blind bend opposite the church. Exiting the property onto the road is already extremely dangerous and the prospect of the increased traffic resulting from the proposals in the local plan will only make things worse. I therefore object to the Local Plan in its current form on following basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8727  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-
hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8739  **Respondent:** 15475393 / Peter Bartlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

This plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve the local situation

I object to the lack of proper infrastructure planning for sites (Policy II)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID:  | PSLPS16/4166  | Respondent:  | 15475649 / Joanne Smith | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

It should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4163  Respondent: 15475649 / Joanne Smith  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The amount of new housing far exceeds local need and the housing density is excessive when compared with existing development. This would transform the Horsleys into a sizable town, something for which no case is made. There is absolutely no local support and the collective impact of these 6 sites on a small part of the borough has not been considered. They certainly should not be treated as isolated, separate sites. In addition, the total amount of new building is out of scale with the planned development elsewhere in the borough, especially less sensitive urban areas that are not protected by Green Belt. The sites listed above are totally unsustainable.

As mentioned previously, the key infrastructure is lacking and no adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding. In addition, no account has been taken of the additional impact of Wisley Airfield site on East and West Horsley and the Green Belt gap with neighbouring settlements will be hugely narrowed, especially if Wisley Airfield is built on. The compliance with NPPF 81 will also be harmed – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4164  Respondent: 15475649 / Joanne Smith  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A38 is particularly due to close proximity to special woodlands including high water table, narrow roads and sheer number of houses proposed for such a small area is not feasible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4165  Respondent: 15475649 / Joanne Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A40 is also particularly unviable because of a high water table and poor drainage, leading to regular winter flooding, in addition safe access and egress at Site A40 is unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8752  Respondent: 15475649 / Joanne Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley and parent to two small children, I STRONGLY OBJECT to East and West Horsley being removed from the Green Belt as proposed in the Guildford Borough Council Proposed Local Plan. We moved to the village to provide a safe village life experience for our children and for them to attend a small community school. The developments proposed would impact adversely on the village, with increased demand on resources and infrastructure that is already under pressure, while damaging the character of the village and its surrounds.
Specifically I OBJECT to Policy P2: Green Belt and the Countryside / Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) for the following reasons:

- The impact on green belt development on local agriculture, rural leisure and tourism, food control, air pollution, natural heritage, water catchment, room for public space amenities and harm to public health and wellbeing have all been ignored.

The first line of Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.” This seems incongruous based on the amount of development proposed. I, along with the residents of West Horsley are totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. There is no evidence that any exceptional circumstance exists to warrant this development and certainly no valid justification provided for the new Green Belt boundaries. There are numerous historic buildings in West Horsley as well as low housing density settlements, all positioned partly in the Surrey Hills AONB and this should be maintained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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In terms of the Sites, I OBJECT to all policies involving building in the Green Belt. No "exceptional circumstances" have been shown and the views of previous residents clearly expressing their views have been ignored. In addition the number of sites is completely excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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I OBJECT to Policy S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable homes. There is only one small shop, no post office and only limited bus service in the village - it would not be able to sustain development suggested in the proposed local plan. Developing additional homes would adversely and completely change the character of the village. The proposals are unsustainable in terms of public transport, parking, shops, schooling, drainage, road capacity, pollution and noise. There is no proof that so many houses are needed. There doesn't seem to be any consideration for access to essential facilities in the policies. There is no clear consideration of schooling in the area. Schools are mentioned in the Definitions under Policy H1 Infrastructure and Delivery but no concrete plans are included to accommodate the increased population and pressure on infrastructure the proposals would bring. In Policy H1 under Definitions, road and transport infrastructure are mentioned but no detail has been provided for West Horsley in any of the Local Plan documents, including the infrastructure Delivery Plan and yet huge areas of West Horsley are being proposed for development, without due consideration of the impacts on the village. In addition West Horsley has not been mentioned in the Local Plan with regards to waste water infrastructure - again, development proposed and no plan to accommodate it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4168  Respondent: 15475841 / David Boothby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Attached documents:
Comment ID: PSLPA16/2090  Respondent: 15476289 / Gregory Heffer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8778  Respondent: 15476289 / Gregory Heffer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence.
compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8774  **Respondent:** 15476289 / Gregory Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8777  **Respondent:** 15476289 / Gregory Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8776  Respondent: 15476289 / Gregory Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8773  Respondent: 15476289 / Gregory Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c.7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/8779</th>
<th>Respondent:</th>
<th>15476289 / Gregory Heffer</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**NO EXCEPTIONAL CIRCUMSTANCES**

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

**BROWNFIELD AVAILABLE**

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8772  **Respondent:** 15476289 / Gregory Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will require a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2091  **Respondent:** 15476353 / Jake Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I believe that the local plan for the Horsleys is a terrible idea. Not only will the roads not be able to cope, and the train station being too small with no room to expand, but this will be building on the green belt which the elected government promised to protect. There are plenty of brown sites available to build on and so this is simply unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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The local primary school is already full and there are no additional places and building expenditure planned. There is no local secondary school and the Howard of Effingham, which is the nearest state secondary school, is at full capacity with no plans for expansion. Therefore there will be no available school places for newcomers. There is nothing in the local plan to address this issue.

Horsley Medical Centre barely manages to cope with current demands for its services. There is nothing in the local plan about expanding this provision. 533 new houses in the Horsleys will severely affect the ability of the Medical Centre to provide a satisfactory service to residents.

Including the development at Wisley, there would be upwards of 6,000 additional cars within a three mile radius of the Horsleys. Apart from the obvious impact on traffic volumes which are already high during the rush hour on the A246, Ockham Rd South and Ockham Rd North, parking will become a major issue. Both Effingham Junction and Horsley Station car parks are at full capacity and parking at the shops, the medical centre and the village hall will be under huge pressure. The local plan completely fails to take account of these issues.

Commuter trains to London from Horsley and Effingham are almost full by the time they arrive in Horsley. How will the commuters from the 2,000 new houses at Wisley and the 533 new houses in the Horsleys get to London? There is nothing in the local plan about either additional trains or additional station parking.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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</table>
6,000 additional cars will mean much higher levels of air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8792  Respondent: 15476641 / Tessa Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new village boundaries have been extended into the green belt to include farm fields and open spaces. For example, the Tennis Club and Kingston Meadows (a green space widely used by local residents adjacent to East Horsley Village Hall) are now included inside the insetting boundary. Insetting makes it easy for the Council to impose additional new builds with almost complete disregard for local challenges. This is an example of the creeping appropriation of the green belt by a local authority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8793  Respondent: 15476641 / Tessa Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new village boundaries have been extended into the green belt to include farm fields and open spaces. For example, the Tennis Club and Kingston Meadows (a green space widely used by local residents adjacent to East Horsley Village Hall) are now included inside the insetting boundary. Insetting makes it easy for the Council to impose additional new builds with almost complete disregard for local challenges. This is an example of the creeping appropriation of the green belt by a local authority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1222  Respondent: 15476641 / Tessa Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Council seems to have completely ignored the objections of Horsley residents to the previous local plan as virtually no account has been taken of these in the current draft plan. The planners appear to be preoccupied with what is legal and compliant (i.e. what they can get away with) rather than the interests and welfare of the people who currently live in the Horsleys or who will live there in the future. I am not objecting to having some increases in housing in the area, but the numbers must be more realistic and appropriate infrastructure must be in place to support the additional number of households. I suggest that the Council:

1. Reduce the number of new houses to be built in the Horsleys by 45%
2. Include infrastructure planning in the local plan
3. Require all developers building new houses to contribute a substantial levy towards infrastructure development or to physically build schools, medical centres, car parks etc at their own expense. (This is commonplace in countries such as Singapore, Dubai and Abu Dhabi and would cost the Council nothing).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8795  Respondent: 15476673 / Josh Hart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft local plan as it will severely affect the quality of life for the residents of both East and West Horsley, including the lives of the newcomers who would be living in the additional planned houses. My objections largely focus on the apparent lack of infrastructure planning and the number of houses planned. Please see below:

The local primary school is already full and there are no additional places and building expenditure planned. There is no local secondary school and the Howard of Effingham, which is the nearest state secondary school, is at full capacity with no plans for expansion. Therefore there will be no available school places for newcomers. There is nothing in the local plan to address this issue.

Horsley Medical Centre barely manages to cope with current demands for its services. There is nothing in the local plan about expanding this provision. 533 new houses in the Horsleys will severely affect the ability of the Medical Centre to provide a satisfactory service to residents.

Including the development at Wisley, there would be upwards of 6,000 additional cars within a three mile radius of the Horsleys. Apart from the obvious impact on traffic volumes which are already high during the rush hour on the A246, Ockham Rd South and Ockham Rd North, parking will become a major issue. Both Effingham Junction and Horsley Station car parks are at full capacity and parking at the shops, the medical centre and the village hall will be under huge pressure. The local plan completely fails to take account of these issues.
Commuter trains to London from Horsley and Effingham are almost full by the time they arrive in Horsley. How will the commuters from the 2,000 new houses at Wisley and the 533 new houses in the Horsleys get to London? There is nothing in the local plan about either additional trains or additional station parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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6,000 additional cars will mean much higher levels of air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Council seems to have completely ignored the objections of Horsley residents to the previous local plan as virtually no account has been taken of these in the current draft plan. The planners appear to be preoccupied with what is legal and compliant (i.e. what they can get away with) rather than the interests and welfare of the people who currently live in the Horsleys or who will live there in the future. I am not objecting to having some increases in housing in the area, but the numbers must be more realistic and **appropriate infrastructure must be in place** to support the additional number of householders. I suggest that the Council:

1. Reduce the number of new houses to be built in the Horsleys by 45%
2. Include infrastructure planning in the local plan
3. Require all developers building new houses to contribute a substantial levy towards infrastructure development or to physically build schools, medical centres, car parks etc at their own expense. (This is commonplace in countries such as Singapore, Dubai and Abu Dhabi and would cost the Council nothing).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1224  Respondent: 15476673 / Josh Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4190  Respondent: 15476737 / R G Parker  Agent:
Traffic along Send Road is heavy and will be made worse when changes are made in accordance with the planning consents for expansion of Vision Engineering premises in Send Road, the Marina in Tannery Lane and the Tannery site additions. It is not acceptable that large areas should be removed from the Green Belt and accepted for development when these three planning consents, when implemented, will have a major affect on traffic in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am very much aware of the value of the Green Belt status, in that it assists local authorities to minimise ribbon and other undesirable developments.

I am horrified and shocked that Guildford Borough Council seem to have abdicated their responsibilities for the controlled development of Send and nearby villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I therefore object to Garlick's Arch (policy A43), Slip roads to the A3 at Burnt Common (Policy A43A) and Gosden Hill Farm, Merrow (policy A25) all breaching the government's commitment for Green Belt Protection. I would like the Planning Inspector to be aware of my objections and the reason for them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8799</th>
<th>Respondent: 15476801 / Raymond and Monica Harmes</th>
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East Horsley with its characteristic mix of Lovelace buildings, thatched properties, woodland and farmland, together with West Horsley are two of Surrey's most desirable villages. Any major new housing development would be detrimental to our wonderful countryside and create an anonymous extension of Greater London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18659</th>
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We are fortunate enough now that we are elderly to live on Ockham Road South, close to all amenities. However, although the village remains largely unchanged, the traffic situation has worsened immeasurably with many heavy lorries thundering through and more and more cars cutting through to access the A3. Should any of the proposed developments take place this could only exacerbate the problem given that most households appear to have at least 2 cars and there is little or no scope for improvement - the infrastructure is already almost at breaking point.

Ockham Road North and South is a narrow road, not constructed as a major route and with very bad drainage as any unfortunate pedestrian will attest to after heavy rain when waders are required to avoid getting splashed by passing vehicles. Accidents in the area around Station Parade are frequent with too high a volume of traffic using the Parade slip road, Kingston Avenue for the Medical Centre and Railway Station branching onto Ockham Road South. The Drift has also
become a rat run for many vehicles with the benefit of Satnav and your plans would be detrimental to the woodland environment and wildlife with increased traffic.

At the weekend especially, the surrounding narrow roads are very busy with cyclists touring the Surrey Villages and motor vehicles have to share the roads with a number of horse riders too. Surely any increase in volume of traffic is highly undesirable.

The Wisley interchange on the M25 is already one of the most congested junctions. A development of 2000 homes close by is sheer madness in the circumstances and would add to traffic chaos through Ripley village and more traffic on all the small local lanes which in many cases are single track with passing places.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8800  **Respondent:** 15476801 / Raymond and Monica Harmes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Keep East and West Horsley in the Green Belt - any other solution is totally lacking in foresight.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8801  **Respondent:** 15476833 / Peter Hart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local primary school is already full and there are no additional places and building expenditure planned. There is no local secondary school and the Howard of Effingham, which is the nearest state secondary school, is at full capacity with no plans for expansion. Therefore there will be no available school places for newcomers. There is nothing in the local plan to address this issue.

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Commuter trains to London from Horsley and Effingham are almost full by the time they arrive in Horsley. How will the commuters from the 2,000 new houses at Wisley and the 533 new houses in the Horsleys get to London? There is nothing in the local plan about either additional trains or additional station parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8802  Respondent: 15476833 / Peter Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6,000 additional cars will mean much higher levels of air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8803  Respondent: 15476833 / Peter Hart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** SQLP16/1225  **Respondent:** 15476833 / Peter Hart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The Council seems to have completely ignored the objections of Horsley residents to the previous local plan as virtually no account has been taken of these in the current draft plan. The planners appear to be preoccupied with what is legal and compliant (i.e. what they can get away with) rather than the interests and welfare of the people who currently live in the Horsleys or who will live there in the future. I am not objecting to having some increases in housing in the area, but the numbers must be more realistic and appropriate infrastructure must be in place to support the additional number of householders. I suggest that the Council:

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4191  **Respondent:** 15476865 / Peter Barratt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Guildford Borough Council's draft local plan proposals to build 1,800 houses and industrial park and a highway on the slopes of the Hogs Back at Blackwell farm which will:

- destroy views from the Hogs back ridge, an AONB
- remove 72 Ha of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am writing to object to the final draft local plan that has just been released, and I want my comments to be seen by the Planning Inspector.

1. I object to the fact that GBC has changed every major site in Send and added a major new road junction without full consultation under regulation 18.
2. I object to Send being removed from the green belt, in particular to areas such as the playing fields and woodlands behind the school, and the land along the River Wey which is a particularly beautiful area.
3. I object to plan for houses and warehousing at Garlick's Arch. This site is new and was not included in any previous consultation. It is Green Belt protected by the NPPF to prevent the converging of communities...no exceptions!!! This site is covered in ancient woodland dating back to the 16th century.
4. I object to the proposal for a new 4 way link onto the A3 at Burnt Common. This would make Send a major thoroughfare for traffic from the M25, A3, and the proposed house at both Burpham and Wisl Send already experiences traffic jams daily and a further burden of traffic such as this would be calamitous.
5. I object to Policy A44, land west of Winds Ridge and Send Hill. This again was not included in the draft and was not consulted upon. Such a proposal would make Send Hill very hazardous for the school children going to and from St Bedes School, and as there was a land fill site there up until the late 80's early 90's it would be an inappropriate area for housing and travellers pitches because of the risk of toxic gas.
6. And in general I object to the proposals as a whole as Send does not have the infrastructure to cope with the additional population and traffic...neither the school or the local sewers, nor the medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to the final draft local plan that has just been released, and I want my comments to be seen by the Planning Inspector.

1. I object to the fact that GBC has changed every major site in Send and added a major new road junction without full consultation under regulation 18.
2. I object to Send being removed from the green belt, in particular to areas such as the playing fields and woodlands behind the school, and the land along the River Wey which is a particularly beautiful area.
3. I object to plan for houses and warehousing at Garlick's Arch. This site is new and was not included in any previous consultations. It is Green Belt protected by the NPPF to prevent the converging of communities. ...no exceptions!!! This site is covered in ancient woodland dating back to the 16th century.
4. I object to the proposal for a new 4 way link onto the A3 at Burnt Common. This would make Send a major thoroughfare for traffic from the M25, A3, and the proposed house at both Burpham and Wisl. Send already experiences traffic jams daily and a further burden of traffic such as this would be calamitous.
5. I object to Policy A44, land west of Winds Ridge and Send Hill. This again was not included in the draft and was not consulted upon. Such a proposal would make Send Hill very hazardous for the school children going to and from St Bedes School, and as there was a land fill site there up until the late 80's early 90's it would be an inappropriate area for housing and travellers pitches because of the risk of toxic gas.
6. And in general I object to the proposals as a whole as Send does not have the infrastructure to cope with the additional population and traffic... neither the school or the local sewers, nor the medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 15477569 / Paul Cheeseman</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt by stealth. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. This development represents greed of the most unpleasant kind.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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</table>
I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) and limited public transport to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling for which there is no empirical or logical evidence provided.
2. The increased volume of car traffic. A proposed development of 2,068 homes most with two cars.
3. The congestion this traffic will cause on the narrow rural roads in Ockham
4. The increase in the already severe congestion on the A3 and Ripley village.
5. The lack of suitable public transport. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars would result in an estimated 4,000 additional cars on the roads on the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
6. The absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
7. The A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt - that is not what Green Belt is for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8819   Respondent: 15477569 / Paul Cheeseman   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4201   Respondent: 15477601 / M Champain   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Horsley countryside preservation society. My concerns for the Horsleys and objections.

- Objections to removing Green Belt.
  1. Loss of countryside which provides recreation and space for our children to connect with nature, so vital in mental health in this electronic age.
2. Such a large increase in population- 533 new houses- will increase traffic congestion and also impact on rail services locally.
3. The suggested increase in land available, noted in ‘extension of boundaries’ clause, must be [scramped] on- an invidious practice our super markets indulge in.
4. The housing plan must include downsize and affordable houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2108  Respondent: 15477665 / S.J. Wilkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Number of houses required.

I disagree with the number of houses required in this plan.

The quoted number of houses required (from the SHMA) is 693. Much uncertainty seems to surround this figure in that it is too high, and double the figure given only four years ago.

The proposed number of 14,000 houses is unsustainable, resulting in over development around Guildford. It also proposes a disproportion of development to the north of Guildford, greatly affecting Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4217  Respondent: 15477665 / S.J. Wilkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4, Gosden Hill Farm Development

I strongly object to the proposed development at Gosden Hill Farm, it should not be built on the Green Belt. The development of 2,000 houses will very much increase the local traffic and put a considerable strain on the infrastructure of Burpham.
Flooding with regards to the Gosden Hill Farm Development-It would appear from the proposed plan that the Merrow Stream will flow through a part of Gosden Hill Farm development. This stream seriously flooded 2 houses during the floods of December 2013 (one to an insurance claim of £80,000). A considerable amount of surface water flowed down from Merrow Park Estate, as it does during heavy rainfall. This swells the Merrow Common Stream and results in flooding around Merrow Lane Bridge and culverts in the Merrow Common Stream. The developers of Merrow Park should have built a holding lake for the estate but this was never done. Consequently, the surface water follows a downward path to the culvert in Merrow Lane. Again, the building of Gosden Hill Farm will cause the drainage water to flow into the stream and increase the possibility of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. Traffic and Roads

The road at present in Burpham are not sufficient to take the amount of traffic which will be generated by the new developments.

The proposed Sustainable Movement Corridor in the proposal of London Road will not take the amount of traffic required, even if the possible A3 tunnel is built.

The increase in traffic will not be able to be dealt with by the London Road/New Inn Lane roundabout.

Thus, again I object to the plan in regard to traffic movement in Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I strongly object to the 2016 Guildford Draft Local Plan on the following grounds in this plan.

1. **Loss of Green Belt Land between Burpham and M25.**

There is a disproportionate level of development to the north of Guildford.

The proposed developments of Garlicks Arch, Send, Wisley and Gosden Hill Farm will be developments that will infill the Green Belt from the Northern Edge of, Burpham up to the M2S at Wisley.

The plan does not offer sufficient evidence of exceptional circumstances to justify allocating Green Belt land for strategic development and more consideration should be given to Brownfield development.

Consequently, I object to the loss of the Green Belt, especially the Gosden Hill Farm development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Where is the evidence of the numbers provided by SHMA – if you do not show us how you arrived at these huge numbers I object</td>
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When did you suddenly seize upon the land at Garlick’s Arch and decide there should be a 4 way junction at the end of Send Marsh Road and the Portsmouth road – why was there no forewarning of this huge new proposed development? I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8881  Respondent: 15477729 / Julia Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council trying to force trough planning and building huge amounts of houses all over the green belt.

ELNA 2015 shows an 80% reduction in employment space needed from their 2013 survey – why are you ignoring this? I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8895  Respondent: 15477729 / Julia Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What is wrong with the conservative councillors? The word conservative should mean keep and safeguard our green and pleasant land, not cover it in concrete! I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/30  Respondent: 15477729 / Julia Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt Policy 2 at paragraph 4.13.15 because

1. Further contempt for the Green Belt by GBC.
2. Totally unsuitable access.
3. Destruction of an area used by so many people for relaxation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/321  Respondent: 15477729 / Julia Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockburn in Tannery Lane because

1. It increases to 60 homes from 45.
2. It ignores the thousands of previous objections previously made by local people.
3. Traffic problems concerning Tannery Lane will worsen considerably.
4. Further contempt for the Green Belt and a history going back to Roman times.
5. Ridiculous promotion of building on an area that is frequently flooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/320  Respondent: 15477729 / Julia Hoar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A43 change at Garlick’s Arch because

1. It ignores the thousands of previous objections previously made by local people.
2. There is absolutely no proven demand for Travelling Showpeople at this location.
3. It will cause chaos where it accesses the Portsmouth Road.
4. It is ancient woodland and shows the contempt the GBC demonstrates for the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to Policy A58 at Burnt Common because

1. There has been a decline in demand for Industrial land and there are empty sites in the area.
2. Impact on traffic at the Burnt Common roundabout will be enormous.
3. Further contempt for the Green Belt by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I wish to object strongly to the proposed building, road, and travellers pitches that GBC have put in place.

1. I object to the increase of proposed houses from 185 to 485 in the area. Send cannot take it.
2. I object to the proposed building on Green Belt. If we do not save the Green Belt the whole of Surrey will be a mass of concrete structures and it should not be thought about. Also the roads will not take heavy traffic.
3. I object to Send being removed from the Green Belt, we don't have enough green areas in Surrey for wild life and parks - one day we will be joined up with Woking and Guildford- not a nice thought
4. I object to the land at Garlick’s Arch Burnt Common being designated for 400 houses and industrial and warehousing. Why use this land when Slyfield is used as an industrial site? I also object to the proposed new
4-way interchange onto the A3 at Burnt Common. This will cause drastic road obstructions through Send as it will be used as a highway from the M25,A3 through to Woking. Send is always gridlocked during peak times - this will only make it worse for residents.

5. **I object most strongly** to the proposed building of 40 homes and 2 travellers pitches in Send Hill. This is a quiet residential area with wood and open Also we now have a lovely Cemetery - the peace would be shattered. Send Hill is a single track road for most of it and the provision of houses together with at least two cars per household would prove catastrophic for the present residents. As for putting 2 travellers pitches in the middle of a quiet secluded spot behind beautiful houses, ridiculous.

6. Has anyone thought of the impact all this new development will have on the local school (full to capacity at the moment) and also medical centre. It's bad enough now to get appointments with our doctors - what will happen when 485 houses are built?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:
- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

6
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.

1931 of 2543
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4221  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):
• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8941  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8943  Respondent: 15478017 / Kirstie Pankhurst  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):
• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8945  Respondent: 15478017 / Kirstie Pankhurst  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):
• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8947  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8924  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E1 (EMPLOYMENT):
• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8926  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8928  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):
• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/8931  **Respondent:** 15478017 / Kirstie Pankhurst  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY):
- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8933  **Respondent:** 15478017 / Kirstie Pankhurst  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):
- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8935  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E7 (TOWN CENTRE):

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8937  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<td>I OBJECT TO POLICY E9 (LOCAL CENTRES):</td>
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<td>• No need for retail development “adjacent” to rural centres for same reason as Policy E8.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY H1 (HOMES FOR ALL):</td>
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<td>• Policy doesn’t set any constraints on building.</td>
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<td>• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.</td>
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<tr>
<td>• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.</td>
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<td>• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1 OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)
• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):
• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8953</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):
• Just a list of generic measures, not related to real life or the particularities of Guildford.
• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8955  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
• No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8916  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P2 (GREEN BELT):
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Comment ID: PSLPP16/8918  Respondent: 15478017 / Kirstie Pankhurst  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8920  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8922  Respondent: 15478017 / Kirstie Pankhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/8905  **Respondent:** 15478017 / Kirstie Pankhurst  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/8907  **Respondent:** 15478017 / Kirstie Pankhurst  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/4224  Respondent: 15478145 / P. A. Key  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also to allow Policy A44 1.9 to go ahead, even though there is documented evidence that the subsoil here is unsafe and by adding this site which was not included in the regulation 18 draft which was not consulted on previously is a disgrace and I strongly object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8956  Respondent: 15478145 / P. A. Key  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe Guildford Borough Council have reversed on their election promise to protect the Green Belt, by wanting to remove the Green Belt from Send Altogether, I strongly Object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2122  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4229  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/4234</th>
<th>Respondent:</th>
<th>15478177 / Michelle Brown</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. And when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8993  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy E1 - Natural environment

The policy should place much greater emphasis on the conservation of the natural environment. It provides for development which will “enhance” natural assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8982  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8988  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9044  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9024  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9014  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students Ire accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9019  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9039  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/8998 | Respondent: | 15478177 / Michelle Brown | Agent: |
|-------------|--------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9004  Respondent: 15478177 / Michelle Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9009  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8967  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8972  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8957  **Respondent:** 15478177 / Michelle Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8962  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1232  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1237  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1242  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2130  
Respondent: 15478209 / Sally Daboo  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3756  
Respondent: 15478209 / Sally Daboo  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/2120  Respondent:  15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this
has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
• Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2125  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7086  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data
• Clandon Cross Roads Area to Bulls Head - 17 incidents
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• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
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• 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see above and below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. To allow this would be plain irresponsible.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 15478209 / Sally Daboo</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infant school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15897  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15904  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15905  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15894  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15896  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15907  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that, whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new Opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15903  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or no force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15901  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. This is another serious flaw in the plan.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This would have many benefits to Guildford itself.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15902  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. This alone makes the overall policy ineffective and capable of challenge.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15898  Respondent: 15478209 / Sally Daboo  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. This will increase the risk of serious accidents.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon where my parents live, already suffer from intolerable traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. As I say above, as an electric wheelchair who often visits, the danger is already substantial and would only worsen if the proposed developments were to go ahead.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network, phone and broadband and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital; where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan. This is clearly a huge flaw in the plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

The A247 in West Clandon is already used by too many vehicles travelling too quickly and any additional traffic could make it dangerous.

As an electric wheelchair user I often travel between my parents’ home [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.] Guildford and Clandon station. The road is already too busy to cross safely, especially when cars are travelling above the speed limit as they often do. There is limited pavement on either side of the road and it is incredibly scary when large vehicles including lorries regularly mount the pavement at various “pinch points” along the road, or come extremely close to me when I am travelling on the pavement. There are no sensible places to cross the A247 between my parents’ house and either the train station or the bus stops, but as I am reliant on accessible public transport I have no choice but to put myself in danger in order to reach my destination. Even where you can see a little distance in either direction, this is insufficient with the volume of traffic using the road and the fact that it consistently approaches at speeds well above the limit. Any increase in the volume of traffic using the A247 (which would be the inevitable outcome were these plans to go ahead as currently described) would be extremely dangerous, not only for myself but for others using the pavements, especially those with disabilities, small children or pushchairs who require the full width of the pavement and can’t move out of the way quickly if vehicles come to close or even mount the pavement. The presence of many narrow points and a large density of twists and turns along the A247 make it difficult for drivers to see what is ahead and drive safely, especially when the speed limit is being exceeded. I believe that local peoples’ lives will be put at risk as a direct result of these plans being carried out as they stand and I fully expect the council to take this into consideration and not go ahead.

Similarly in peak times Guildford City Centre is already too busy and congested, and there is little possibility for mitigating this problem, or indeed consideration of this issue in the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15892  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15890  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>SQLP16/1758</th>
<th>Respondent:</th>
<th>15478209 / Sally Daboo</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: SLP16/1760 | Respondent: 15478209 / Sally Daboo | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1761  
Respondent: 15478209 / Sally Daboo  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/214  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2024  Respondent: 15478209 / Sally Daboo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Gosden Hill development of 1,700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7,000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1,700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the Green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over nine years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented”.
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. This is particularly wasteful at a time when our economy is under stress and every effort should be made to be efficient.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space”.
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has even less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure? It is clearly impossible to go head with the proposed developments absent guarantees that appropriate infrastructure is in place.

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

**Summary of the Impacts on the A247 – My Objections**

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

You will recall that in prior responses I explained that my wheelchair-bound disabled daughter often visits us and travels from Clandon station to our home along the A247 and that any increase in traffic ill increase the danger to her in making that journey. I see no attempt to deal with this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Non-plan Items – My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).
Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion and their effects on public health) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4226  Respondent: 15478273 / Margaret Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2134  Respondent: 15478497 / Enid Woodford  Agent:
I wish to object to the number of new houses proposed in the new Local Plan. I think that integrating the huge number of new residents would be almost impossible as the local facilities such as the Medical Centre, Schools, and indeed the roads themselves, are already under great pressure. Some things like car parking at the Railway Station cannot be made bigger as there is no space available.

I also feel that any building that does take place should be infill building, and not seen from the roads through the village, as this would not alter the look of the village too dramatically.

I am also against your suggestion that we should be removed from the Green Belt as I believe this would in time lead to extensive building on our open fields and green areas.

I know that we must have some new homes built but not in the numbers you are suggesting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Send Village being removed from the Green Belt - Insetting or changes to the settlement boundary from the Local Plan 2003 to the Local Plan 2014 are extremely unsettling and appear to amount to some 204 acres of land being removed from the Green Belt and mean that all such sites within the village boundary changes could be vulnerable to development. This gives me extremely deep concerns about whether I will be living in a village in the future - if I wanted to live in a town I would have bought a house in Guildford or Woking! I moved to Send because it is semi-rural and gives me access to the countryside.

Once the Green Belt is lost it is lost forever. Send's Green Belt provides an essential buffer stopping Woking (and the way things are going Guildford!) becoming one conurbation through urban sprawl. Local Councillors (especially Conservatives) and central government gave a clear election promise to protect the Green Belt - this reneges on this and at 204 acres in a massive way - and you wonder why people do not trust elected officials! There are no special reasons to justify removing most if not all of the areas from the Green Belt and you appear to be concealing relevant information as to how housing demand, constraints etc have been applied. I am deeply concerned for the long term future of Send as a village. I OBJECT to the disproportionate allocation of housing in this particular part of the borough - At 485 proposed houses for the Send Ward this appears to be about a 28% increase in the number of homes in Send - that is significant in my books and seems disproportionate and inappropriate.

Please note I am not against development per se - I did not object to the Vision Engineering development which is right next to me and I did not object to the proposed Marina in Send. I understand the need for some development so I will not outright object to all the developments planned for Send and can see some merits in A43 and A43a, however, this needs to be the right reasons and done properly. Overall I have a lot of concerns about the lack of transparency of the plans, a concern that the infrastructure will not be up to the job, a concern that there will be unintended consequences particularly with regard to traffic volumes and congestion and traffic flows if some of the major developments go ahead. The A3 is certainly not up to the job of dealing with significant development.

I trust that these objections will be fully considered and that a) the proposed plans to remove Send from the Green Belt will be duly removed from the local Plan with immediate effect and the Settlement Boundary will predominantly remain as per the local Plan 2003 and b) any housing development will be appropriate and proportionate such that Send remains a village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I'm registering my objection to removing the villages of Chilworth, Shalford and Peasmarsh from the Green Belt.

I'm a Chilworth resident. My name is Mrs and my address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I object on the basis of perceived lack of infrastructure in the area, damage development will do to the local environment, we're in an area of outstanding natural beauty and next to a heritage site, and it contravenes why we chose to live here - a small local village and community which isn't built-up/vastly populated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2139  Respondent: 15478785 / Alicia Grainger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The amount of new housing far exceeds local need. Houses already stay on the market for a while in the village, and the number of proposed houses is simply not needed.
- The housing density proposed is excessive when compared with existing developments. Part of the character of our village is that we are amongst green spaces and fields, and very much part of the countryside. Lose that, and you risk losing half the people who live in the village.
- The proposed size of development would transform the Horsleys into a town – which is not why people chose to live here. We chose to live here because of its rural character, and the case has not been made for the number of houses. Where are the calculations that support the proposals?
- There is simply no local support for the size of development. The collected impact of the 6 sites has not been considered – they should not be treated as isolated, separate sites, when in reality residents travel through these areas every day.
- The infrastructure will not support the proposed development – there is already poor wastewater capacity, lack of school places, absence of traffic management plans, flooding etc. and there is no adequate plans to increase it.
- The plans will harm compliance with NPPF 81 for example by making cycling (a key character of the village), and races such as the Prudential Ride London too dangerous, ruining the rural setting of Waterloo Farm campsite, and destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 is especially unviable because of high water table and poor drainage, which will lead to regular winter flooding. We already have numerous occasions during winter when we have to travel on different roads because of flooding.
- The safe access at Site A40 is unachievable. There is already high speed limits, poor sight lines, narrow access to existing properties and inadequate pavements for the elderly and school children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4544  Respondent: 15478785 / Alicia Grainger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It doesn’t allow for the huge increase in traffic which would result from spreading new housing estates across the borough. West Horsley already has busy roads with commuters, parents doing the school run rushing through the village every day. The pavement is already narrow, and I personally don’t always feel safe walking along the pavement in what should be a 30 mile an hour zone, but where cars in reality drive much faster. In a village where people regularly walk dogs and walk to children to and from school etc, a serious accident would just be waiting to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4242  Respondent: 15478785 / Alicia Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This shouldn’t be in the plans for all the reasons that the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. Only 15% of the land is brownfield site land and it is simply too close to RHS Wisley and the Thames Basin Heath SPA. Increased traffic would no doubt aggravate traffic jams at the A3 roundabout and M25 Junction 10 and cause an unacceptable increase in pollution. The is no existing public transport and the stations are miles away. The housing density is far too great and over 2000 houses will swamp and destroy the Ockham conservation area, with an impact on listed buildings. The water table and surface water flooding has not been considered either for the site itself or for downstream areas of the River Mole. There will be a major impact on neighbouring villages, especially the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9080  Respondent: 15478785 / Alicia Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The targets are unsustainable if the Green Belt is covered with the amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9081  Respondent: 15478785 / Alicia Grainger  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure seems to have been considered as an after thought. The excessive housebuilding in the countryside is not supported by any funding or provision for infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9082  Respondent: 15478785 / Alicia Grainger  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy I3

I’m not convinced that the measures are related to real life or the particularities of Guildford. Most people don’t or can’t walk or cycle here – commuters are in a hurry, and people carrying heavy shopping or other goods i.e. most residents, wouldn’t use the transport suggested. It is a towns eye view of transport and ignores the scarcity of existing rural public transport and commercial unviability of increasing it. It ignores the terrible state of Surrey’s roads, potholes, flooding etc. and the huge extra stress that would be created by new housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9077  Respondent: 15478785 / Alicia Grainger  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Perhaps most importantly, the statement included in the plan “We will continue to protect the Metropolitan Green Belt” goes against everything that the Plan proposes to do in East and West Horsley, with 65% of the new houses being built on Green Belt land. Protection of the Green Belt land has to be one of the most important issues for villages like West and East Horsley and the impact on flooding control, tourism and leisure, rural businesses, natural heritage and biodiversity have not been considered. There is a disproportionate amount of development to be in the Green Belt, with too few homes in urban areas where most people (especially the young and less privileged) want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/9078  | Respondent:  | 15478785 / Alicia Grainger  | Agent: |
|--------------|----------------|--------------|-----------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Perhaps most importantly, the statement included in the plan “We will continue to protect the Metropolitan Green Belt” goes against everything that the Plan proposes to do in East and West Horsley, with 65% of the new houses being built on Green Belt land. Protection of the Green Belt land has to be one of the most important issues for villages like West and East Horsley and the impact on flooding control, tourism and leisure, rural businesses, natural heritage and biodiversity have not been considered. There is a disproportionate amount of development to be in the Green Belt, with too few homes in urban areas where most people (especially the young and less privileged) want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/9079  | Respondent:  | 15478785 / Alicia Grainger  | Agent: |
|--------------|----------------|--------------|-----------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This limits development of urban, brownfield, hardstanding sties, and pushes development unnecessarily into the countryside, simply pushing the problems of flooding elsewhere. West Horsley is already surrounded by many waterways, rivers and streams which in heavy rain regularly causes flooding on the roads. Further housing development in the area is going to cause even worse problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2144  Respondent: 15479201 / Nick Norton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the HRA and its Appendixes A, B and C

Summary

The HRA omits vital evidence and fails to fully assess the cumulative impact of all proposed development in the 400m-5km TBHSPA mitigation zone.

- It fails to show any base line 'real world' air pollution evidence.
- It pre-determines whether Natural England will act to approve both strategic and "bespoke" SANG submitted for planning approval.

- It demonstrates that Policy S2, H3, P2, P3, E1, E2, E4-9, I3 (13 out of 27 Policies = 50% approx of all policies) have an impact on TBHSPA but this is not referred to in the conclusion.
- It demonstrates that the majority of sites in 400m-5km mitigation zone need special HRA evaluations to be carried out (63 out of 82 sites in total [77%]) but this is not referred to in the conclusion.
- It fails to include an evaluation the most recent visitor survey of TBHSPA 2012/13 (see below)

Key Points of Objection

1. I object to the omission of 2012/13 Natural England survey of visitor numbers to the TBHSPA report from the HRA
The HRA fails to list the 2012 Natural England Survey of Visitors to the TBHSPA as material evidence (Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA), First Published 13 February 2014; Natural England Project Manager - Patrick McKernan, Natural England, Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD Contractor - Footprint Ecology, Forest Office, Cold Harbour, Bere Road, Cold Harbour, Wareham, BH20 7PA).

1. I object to the failure of the HRA to examine the observed visitor trends between the 2005 NE Visitor Survey and the 2012/13 NE Visitor Survey

The 2012 NE visitor survey reports a 10% increase in visitor numbers. This is neither considered nor critically appraised as a contribution to the analysis of success or failure of the TBHSPA Avoidance Strategy 2009-2014 and the implications for Policy P2, P5, E8 and E9.

1. I object to the failure to present evidence in the HRA whether or not current SANG or SAMMS policies are effective

The HRA fails to assess whether SANG and SAMM current policies and programmes are effective, either independently or in combination, in attracting visitors, cross-country cyclists and dog-walkers away from TBHSPA. On enquiry, Natural England admitted they have no such survey evidence for TBHSPA SANG or SAMM programmes.

1. I object to the failure to properly assess the potential impact of disturbance and predation rates by newly introduced pet populations (dogs and cats)

The HRA fails to assess in detail, with associated numerical calculations and a described methodology that can be independently verified, the cumulative potential impact on disturbance and predation rates within TBHSPA by the introduction of domestic pets (dogs and cats) from new dwellings; the introduction of over 8,000 dwellings within the 400m-5km mitigation zone will give rise to over 19,000 human inhabitants (ONS 2.4 people per household).

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The
indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 8,000+ new homes), the cumulative impact of dog ownership (up to an estimated 2,500 new dogs and 2,000 new cats within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase.

1. I object to the lack of direct measurable observations of the level of critical components of air pollution in the HRA

The HRA fails to present any actual evidence of current air pollution levels derived from roadside monitoring on critical routes within the 400m-5km TBHSPA mitigation zone (e.g. A324, A320, A321, A323) so as to set an acknowledged and proven base line from which to measure future incremental impacts on air pollution from the proposed housing developments and associated traffic movements; the introduction of associated vehicle ownership with its potential to increase NoX and CO2 in the 400m-5km mitigation zone; and over 10,000 vehicles (ONS 1.25 vehicles per household) in the 400m-5km mitigation zone.

"Section 10.4 Only mathematical modelling of air pollution has been carried out. There has been no physical evidence collected on the main feeder routes so there is no actual physically measured base level on which to judge neither the current nor incremental air pollution impact in the 400m-5km mitigation zone."

Simply modelling air pollution and declaring the model output as actual air pollution levels is irrational and non-sensical. Physical measurement must be carried and the evidence presented for further public consultation to be based in sound science, not speculation.

If applied to the human population, it has been estimated that sources of automotive air pollution account for approximately 5% of premature deaths (The WHO’s health risks of air
pollution in Europe (HRAPIE) report put the equivalent mortality increase for NO2 at 5.5%.) and among the 19,000 new inhabitants proposed in the this Local Plan in the 400m-5km TBHSPA mitigation zone this represents a premature death incidence over time of some 1,000 individuals.

1. I object to the lack of detailed assessment of 50% of all proposed Policies and 77% of sites under the Impact Pathways in advance of policy formation

Under the Sustainable Employment Sites (Policy E1) the following sites require special site level HRA but no attempt is made to evaluate this in advance to advise policy formation.

Office (B1a) and R&D (B1b) Strategic Employment Sites (1 out of 6 sites)

- Pirbright Institute

Industrial (B1c, B2 and B8) Strategic Employment sites (2 out of 10 sites)

- Lysons Avenue, Ash Vale
- Henley Business park, Normandy

District Centres (Policy E8) (3 sites)

- Wharf Road, Ash
- Station Parade East Horsley
- Ripley

Local Centres (Policy E9) (14 sites)

- Aldershot Road, Westborough
- Collingwood Crescent, Boxgrove
- Kingpost Parade, London Road, Burpham
- Epsom Road, Merrow
- Kingfisher Drive, Merrow
- Madrid Road, Guildford Park
- Southway, Park Barn
- Stoughton Road, Belfields
- The Square, Onslow Village
- Woodbridge Hill, Guildford
- Woodbridge Road, Guildford
- Worpleston Road, Stoughton
- Ash Vale Parade, Ash
- The Street, Tongham

Rural Local Centres (Policy E9) (3 out of 6 sites)

- Bishopsmead Parade, East Horsley
- Effingham
- Fairlands, Worpleson

Site Allocations within 400m-5km mitigation zone (40 out of 43 sites)

- Guildford Town Centre
The HRA states "Due to their close proximity to the SPA (or the potential for developments in such close proximity to be facilitated by these policies), the above proposed policies/locations have potential to result in dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. Projects within 400m of the SPA that are to be brought forward under these policies will therefore need to be accompanied by Habitat Regulations Assessment that will investigate these impacts in detail."

"These impact pathways cannot be investigated in detail at the Local Plan level as they are related to detailed design and construction method."

This statement is an avoidance of more detailed consideration of environmental impacts in the construction and operational phase of each site in order to permit residents more appreciation of the impacts. If AECOM can model supposed air pollution levels then AECOM can model the impact of dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff during both construction and operation. GBC have failed to undertake suitable briefing of AECOM and have failed to take account of potential environmental disruption in advance of policy formation.
I propose that to remedy these failings the final sentence of paragraph 7.2.5. should read

"These impact pathways will be investigated in detail at the Local Plan level by using appropriate modelling to illustrate the environmental impact of each site during construction and operation. The methodology and assumptions of the model proposed shall be available for public scrutiny. The resulting model output shall report on the following parameters; dust deposition, noise and vibration impacts, lighting and visual disturbance and surface runoff; and be prepared in advance of the Regulation 19 Examination in Public and submitted as part of the Guildford evidence base for the Guildford Local Plan, Proposed Submission."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4254  Respondent: 15479201 / Nick Norton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A46.

This land is located with land parcel H12 as identified in GBCS Vol IV. The land is DEFRA agricultural land Grade 3A and has been farmed traditionally for pasture (sheep and cattle) and for grain (wheat and barley) in perpetuity. The land contains many stands of scheduled Ancient Woodland. The land contributes to the ‘openness’ of the Green Belt between the settlements of Flexford and Normandy and should remain ‘washed over’ by the Green Belt.

Legal Precedent

I object to the removal of the land allocated to Policy A46 by removal from the Green Belt by “inset” under NPPF para 83 and 84.

The “exceptional circumstances” required to redraw the Green Belt boundary for the land in Policy A46, appear nowhere in the Local Plan so how can I judge this proposal?

In the Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J decision in particular lays out:

“Exceptional circumstances are required for any revision of the boundary, whether the proposal isto extend or diminish the Green Belt. That is the ratio of Carpets of Worth."
Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration."

Without the “exceptional circumstances” included in the proposals for this Policy it appears unsound.

Guildford Borough Settlement Profiles (July 2013) & Settlement Hierarchy (May 2014)

I object to the use of a 2010 survey of parishes that was not represented to parish councils as to be part of the Local Plan evidence base in an attempt to present the two settlements as one in the Settlement Profile document. It is recognised in the Settlement Hierarchy that Flexford and Normandy are separate settlements, neither rank highly based on their individual sets of community facilities and services (Normandy 13, Flexford 27 sustainability ranking in Settlement Hierarchy report).

There is no traditional community centre. The ward contains five hamlets in a dispersed area. It is disingenuous to represent Flexford and Normandy as a combined community. .

The incorrect assessment in the Settlement Profile document has been pointed out under Regulation 18 consultation but the council continues to include this flawed document as evidence.

It should be discounted and removed from the evidence base.

Use of educational provision as “exceptional circumstances”

I object to the proposed site of Normandy/Flexford (Policy A46) for a new Secondary School; this should be rejected as the need for such a school in the location has not been proven. GBC in the Infrastructure Delivery Plan, May2016 indicate that SED 3, IDP p87, a 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site, requires only 1 FE to serve the development site itself, the remaining capacity would serve the wider area, including Blackwell Farm site (Policy A26). However, given that the proposed Blackwell Farm development is for 1,800 dwellings, on a pro-rated basis of children of secondary school age within the arising population, this would only require a maximum of 2FE. Together, the Blackwell Farm site and the Normandy/Flexford site require only an estimated 3 FE provision. The proposed school is excessive in size, being more than twice as large (7FE) as the estimated need (3FE), and as other information provided here indicates, this is well within the funding and expansion capabilities of existing schools in the western wards of Guildford borough and the western side of the town. Every neighbouring secondary school is currently undersubscribed, Kings Manor in particular with 57% of its school places currently unoccupied.

SCC Education Officers need to demonstrate a clear need for such a school at this, given the current under-subscription of all the neighbouring secondary schools in the western wards of Guildford borough. There are currently 736 vacancies at the nearest secondary schools serving the western wards - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. In addition to those, SCC has already approved expansions at the County School, Guildford and St Peters.

Adding forms of entry to several existing schools will see the costs absorbed after the initial capital cost needed to create a few extra rooms and they still only require one headteacher, one set of staff etc. The Head Teacher and Chairman of Governors at Ash Manor School have offered to cooperate with a programme to expand that school, as had the Principal at Kings ; if it needs expansion in the future there is space and a willingness to do so.

Contribution to the Purposes of the Green Belt

I object to the overriding of the contribution the land proposed for Policy A46 makes to the 5 purposes of the Green Belt in response to a developer-led proposal for large-scale house building in the Green Belt in Policy A46.

Guildford Borough Council recognises the contribution the land surrounding and within the settlements of Normandy and Flexford makes to the five purposes of the Green Belt in identifying land parcels H10, H12, H13, H14, H15, H16, J16 and J17 of particular sensitivity in its reevaluation of the land parcels in the Green Belt & Countryside Study, Vol 2 Addendum, Appendix 1 and 2, reinforcing the evaluation in GBCS Vol 1. The evaluation of the ‘land parcels’ is laid out in the tables in
The ‘land parcel’ that contains the land proposed for Policy A46 is H12, evaluated against 4 purposes of the Green belt it performs as follows:

- Checks sprawl of Normandy and Flexford
- Prevents Flexford and Normandy from merging
- Assists in safeguarding the countryside from encroachment

All of this is then ignored in the rush by GBC to appease Taylor Wimpey in order to affirm another strategic housing site and hold its hands up as if to say “not us Guv, its wos the developer that done it”.

Contribution to ‘openness’ of the Green Belt

I object to the rejection by GBC that the land proposed for Policy A46 fails to contribute to the “openness” of the Green Belt.

In the case of Normandy and Flexford, there have been two planning appeals concerning Gypsy pitches (Palm House Nurseries and Green Lane East) where the inspector agreed that land near Flexford and land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that the land around Normandy and Flexford is considered by the Planning Inspectorate to exhibit ‘openness’. A third more recent decision at appeal for housing development at North Wyke Farm found that the land contributed to the ‘openness’ of the Green Belt.

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

I believe this indicates that PINS inspectors recognise the “openness” of the land around the two settlements of Normandy and Flexford and their contribution to the “openness” of the Green Belt.

Impact on Surrey Hills AONB

I believe both settlements should remain ‘washed over’ by the Green Belt as stated in NPPF para.86 “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt”.

The land designated as AGLV and identified as 12-1 in the Map AONB Boundary Review - Recommended Areas for Consideration and pp28-29 AONB Area of Search Evaluation - Natural Beauty Evaluation, Oct 2013 report to be added to the Surrey Hills AONB, reinforces the proximity of valued landscape as it will add the north slopes of the Hogs Back overlooking Flexford settlement to the very boundary of Flexford settlement at Flexford Road.

Further, the land allocated in Policy A46 contains unrestricted view of the Hogs Back, part of the Surrey Hills AONB. Recent case law establishes that views out from open land to an AONB are as important as views into land overlooked by an AONB. Surrey Hills Management Board (of which GBC is a member) has submitted proposals to Natural England for land currently with local designation Area of Great Landscape Value on the north slopes of the Hogs Back above Wanborough and stretching down to Flexford Road at the southern boundary of Flexford settlement to be subsumed into the AONB and is currently awaiting agreement for inclusion.

The future potential presence of in excess of 1,000 houses visible at the periphery of the AONB with associated urbanising infrastructure (e.g. roads, perpetual street lighting, general light pollution, loss of ancient hedges and trees etc.) would do...
great harm to the views into the AONB from the land between Normandy and Flexford and from the Surrey Hills AONB. There will be significant light pollution in winter months.

Thames Basin Heaths SPA

I object to the assertion in Policy P5 that the creation of SANG will protect the rare ground-nesting bird species on this SSSI and Natura 2000 site from major disturbance and predation introduced by the building of 1,100 dwellings that give rise to hundreds of adults and children, vehicles, dogs and cats within 1 kilometre of this internationally important wildlife habitat.

The 2012/13 visitor survey report commissioned by Natural England on behalf of the Thames Basin Heaths Joint Strategic Partnership Board showed not a static or falling number but a 10% increase in visitor numbers since 2005:

- 66% cited dog walking as the main activity
- 80% of interviewed groups had dogs
- 67% of interviewed groups had dogs which were seen off lead
- 39% specifically visited the SPA site was because it was ‘close to home’
- the average distance travelled was just over 2.5 kilometres (80% by car)

Only 1% of visitors accessed the TBHSPA from the Normandy/Flexford direction, so the additional disturbance caused by the building and then occupation of 1,100 homes by 2,000-3,000 residents and 1,250 additional vehicles will be significant. Importantly, the prevalence of dog walking in the visitor survey suggests that the currently available SANG in the borough is ineffective in attracting those wishing to exercise dogs away from the TBHSPA.

Simply claiming that the 2012 visitor study data indicates success of the avoidance strategy in drawing people away from the SPA is no evidence at all. Where is data based on measurement of visitor numbers to the available SANG within Guildford borough? Where is the evidence that SAMM programmes have any impact on the behaviour of residents that are dog owners? Without it, a planning inspector has no means of finding the proposal of large-scale housebuilding at these sites sound. Natural England have admitted that no survey evidence exists of the effectiveness of SANG or SAMM programmes in directing dog-walkers away from TBHSPA in Guildford borough or any of the surrounding local authorities.

Creating 1,100 homes on Green Belt land between the settlements of Normandy & Flexford implies, on average, 340 dogs and nearly 290 cats (based on a survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats); all housing to be located within 1 kilometre of the SSSI;

for a dog owner, a 2-minute drive or 10 minute walk away. The survey showed dogs were more likely to be owned by rural households.

The proposed SANG schedule in the Infrastructure Delivery Plan, May 2016 (IDP, SANG 13 p84) gives indication of neither the physical size nor location of bespoke SANG for Policy A46 (LAA Site 368); it is estimated that this proposed open space will be unable to cater adequately for 340 additional dogs plus their accompanying owners and there will be significant ‘leakage’ onto the TBHSPA.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>15479201 / Nick Norton</td>
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<tr>
<td>Agent:</td>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A47</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I object to Policy A47</th>
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</thead>
<tbody>
<tr>
<td>I object to the proposal that the land that contains the majority of an SNCI should be proposed for housing development.</td>
</tr>
<tr>
<td>The National Planning Policy Framework (NPPF) states that “The purpose of planning is to help to achieve sustainable development” and it describes three “dimensions” relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement “…..helping to improve biodiversity, use natural resources prudently…..”</td>
</tr>
<tr>
<td>This is a quote from point 7 of the section dealing with achieving sustainable development, in the NPPF.</td>
</tr>
<tr>
<td>In the section headed “Conserving and enhancing the natural environment” (section 11), it is stated inter alia that planning policy should protect and enhance valued landscapes and minimize impacts on biodiversity providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations……”</td>
</tr>
<tr>
<td>Guildford Borough Council (GBC) interprets the NPPF through their ‘Policy I4‘ which emphasises the commitment to biodiversity stating: “The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)”.</td>
</tr>
<tr>
<td>Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.</td>
</tr>
<tr>
<td>Policy I4 goes on to say that “Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity.”</td>
</tr>
<tr>
<td>The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012.</td>
</tr>
<tr>
<td>It is shocking that an SNCI should be considered a suitable site for development, particularly given the statements in the NPPF (Para 109) and Policy I4. I find it a telling insight into the very low value that GBC places on biodiversity and wildlife.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A49
I object to the “insetting” of the land proposed for Policy A49. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. I propose this land should continue to be “washed over”.

Legal Precedent
I object to the removal of the land allocated to Policy A49 by removal from the Green Belt by “inset” under NPPF para 83 and 84. I believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. I draw attention to the following cases

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J

In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth. Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

I contend that no “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

Contribution to ‘openness’ of the Green Belt
There is no legal definition of ‘openness’ but it is specifically expressed in NPPF para. 79 that appears as the first paragraph in “Section 9 Protecting Green Belt Land”; ‘openness’ is matter of opinion and that opinion is often expressed in the decisions of Planning Inspectors when assessing a planning appeal.

In the case of Palm House Nurseries the inspector agreed in 2011 that land to the west of Glaziers Lane exhibited ‘openness’. The inspector found in favour of the appellant on other grounds but the opinion on ‘openness’ in those judgements is evidence that this land around Palm House Nurseries is considered by the Planning Inspectorate to exhibit ‘openness’.

Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 APP/Y3615/A/10/2131590 Decision 24 Feb 2011

“Openness
15. The Secretary of State agrees with the Inspector's assessment of the impact of the proposals on the openness of the Green Belt at IR99-100, and his conclusion at IR101 that there would be considerable harm in this respect. For the reasons given at IR101, the Secretary of State also agrees with the Inspector's conclusion that the development would result in some limited harm to one of the five purposes of including land in the Green Belt identified in PPG2, namely that of assisting to safeguard the countryside from encroachment (IR101). “

Green Belt & Countryside Study, Vol. 4
In the Green Belt & Countryside Study Vol 4, Land parcel H10 that contains the Palm House Nursery site was judged the fulfil three essential purposes of the Green Belt

- Checks sprawl of Normandy
- Prevents Normandy, Wood Street Village and Flexford from merging
- Assists in safeguarding the countryside from encroachment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A50
I object to the “insetting” of the land proposed for Policy A50. By proposing to ‘inset’ this site an ‘island’ urban site would be created, removing the ‘openness’ of this Green Belt land confirmed in the judgement of the Planning Inspectorate and similarly judged in the evidence of the GBCS Vol.4. I propose this land should continue to be “washed over”.

Legal Precedent
I object to the removal of the land allocated to Policy A50 by removal from the Green Belt by “inset” under NPPF para 83 and 84. I believe that current case law militates against the removal of land by the re-drawing of Green Belt boundaries without the express presentation in the written Local Plan of the “exceptional circumstances” proposed to redraw the Green Belt boundary for the land in Policy A46. I draw attention to the following cases
- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin), Hickinbottom J
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin), Patterson J

In the Solihull BC decision in particular
“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. That is the ratio of Carpets of Worth. Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

I contend that no “exceptional circumstances” for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy H3
I object to this policy which allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for market housing. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.
This will allow development where it would otherwise not be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances.

Re: rural exception sites, the NPPF deals with this in NPPF 54 which states:

“In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”. This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:
Paragraph: 034 Reference ID: 3-034-20140306
Can unmet need for housing outweigh Green Belt Protection?
Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.
Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.
This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.
NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are: limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.
The wording of this policy- “contribute to meeting local needs” implies that GBC plans to use these to meet its normal housing list; “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”, not “local” at all.
This policy requires revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

• make it clear what the requirements are to qualify for the scheme
• ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only where there is demonstrable unfilled local need and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy I4 Green and Blue Infrastructure

The policy appears therefore to be a box-ticking exercise with no real teeth to it. There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land. “The natural world, its biodiversity and its constituent ecosystems are critically important to our well being and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making” (Biodiversity 2020 page 11) “As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making.” (Government Planning Guidance)

I have some concerns that “enhancing” the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used. It is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area and could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive. John Rigg of Savills and Guildford Vision Group indicated to the GBC Scrutiny Committee that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals. Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan.

It is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. Such a regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

Responses to policy notes:
4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, "garden grabbing" and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

Responses to definitions
4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition. The points made are aspirational that have no enforcement to back them. Building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site.
4.6.45 In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and ignores the impact on existing wildlife. In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist. Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough.

Key Evidence
Guildford Borough Policy Statements are statements – not evidence
Additional evidence should include:

- Existing SNCI surveys, including those that took place in 2004-2007.
- Biodiversity evidence emerging from Neighbourhood Plans.
- Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.

Monitoring
Simply maintaining open space will not be enough for a significantly enlarged population. Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat. SANG delivery is harming existing biodiversity. It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. The approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims. If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9114  Respondent: 15479201 / Nick Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P1 Surrey Hills Area of Outstanding National Beauty.
I object to Policy P1 and its supporting text, which I consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.
My concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:
“All proposals will be considered against whether they…”
“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”
Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins:
“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”
I believe that this whole opening clause should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”
I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:
● “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
● “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
● In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate.
Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9115   Respondent: 15479201 / Nick Norton   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 Green Belt
This policy states, “the general extent of the Green Belt has been retained.” I do not accept this statement.
The Metropolitan Green Belt forms 89% of the borough and should be the cornerstone of all local planning policy. As noted under Policy S1, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.
Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:
1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am worried that settlement boundaries are to be greatly extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Effectively, this policy makes all villages within the Green Belt vulnerable to large scale development.

This policy is disproportionate in terms of foreseeable development need. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9116  Respondent: 15479201 / Nick Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P5 Thames Basin Heaths SPA

I believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

Thames Basin Heaths Special Protection Area is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

SANG (Suitable Alternative Natural Greenspace) is not additional; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG, in part used to prevent dogs and cats attacking nesting birds, must ensure that it is not using land which is adjacent to the special protection areas.

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths.
A survey in 2005 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/9150</th>
<th>Respondent:</th>
<th>15479425 / David Mitchell</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>This is to register my objection to the current local plan. Without a complete and probably impossibly expensive rerouting of the roads, Guildford will simply gridlock on a much more frequent basis. There is not the wider infrastructure to support the current plans and the planned development would irreparably damage the surrounding, beautiful countryside.</td>
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<td>I'm pretty staggered that the current plans have got this far. They would be a disaster if implemented.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
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<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
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<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
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<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
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<td>• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.</td>
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</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4269  Respondent: 15479457 / Philip. L Earle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council (GBC) Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brown field land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths, the lack of pedestrian footpaths and the space to provide either, together with the pitiful state of the existing highways, which are currently dangerous for cyclists.

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and demand for car parking at each station is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/2331 | Respondent: | 15479457 / Philip. L Earle | Agent: |
|-------------|--------------|-------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.
8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars (probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

Please note that I reserve my right to attend the inquiry and personally present evidence.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from direct public transport links – there are no railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport.

Greater consideration should be given to increasing the density of development in present urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from significant congestion. Further vehicle movements will result in even more acute congestion and greater pollution and noise. Residents and the environment will suffer as a result.

2) I object to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey at an apparent detriment to borough residents.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. In particular, residents in Send and Clandon will suffer as a result. Further vehicle movements will result in even more acute congestion and greater pollution and noise. Residents and the environment will suffer as a result.

3) I object to not protecting the Green Belt (Policy P2).

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt.

Once villages are removed they are removed forever. Villages are a quintessential element of life in the borough – for the villagers themselves and for large numbers of people in areas surrounding the villages. Villages cannot be replaced with the sweep of the planner’s pen. Planning history is littered with failed attempts to create the unique character and life of traditional villages in a modern project. We have wonderful and meaningful villages and cannot afford to lose them. In fact, there are no plans to build new villages hence we cannot afford to lose our existing villages.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there are numerous brownfield sites in the borough with surplus land that could accommodate a further development.

4) I object to development in areas which are at risk of flooding (Policy P4).

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

There are many other sites in the borough not designated as flood risks that can be developed for housing and industry without such risks and without condemning families and business to highly likely flooding events and the inevitable disruptions and costs.

5) I object to the sustainable employment policy (Policy E1).

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

There is also brownfield site at nearfield Slyfield that is highly suited to industrial development. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

6) I object to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2).

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

There is also brownfield site at nearfield Slyfield that is highly suited to industrial development. There is no evidence that industrial development in addition to that planned and possible in Slyfield is needed at Garlick’s Arch and that it would warrant a plan that does so little to meet the needs and desires of the local community.

7) I object to the loss of rural employment (Policy E5).

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

8) I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees. The ancient woodlands are an amenity enjoyed by many in the borough.

9) I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages not just from the traffic created by the proposed developments but from the rat-running the proposed developments will encourage. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result
in the road becoming ever more dangerous for pedestrians.

10) I object to the lack of proper infrastructure planning for sites (Policy I1).

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers.

No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

11) I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2).

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse. It must not be a planning goal or consequence to make matters worse for residents of the borough.

12) I object to concerns of poor air quality (Policy I3).

Paragraph 4.6.27 of the Plan states “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.”

The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

13) I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which

requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site.

This only came to light for local residents following a Council meeting on 11th May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3). Many residents in the borough would object to the removal of protection for these trees.

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services
such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

14) I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a).
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking would become through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 would go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

15) I object to the proposed Infrastructure Schedule (Appendix C).
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

16) I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as being too high (Appendix D).
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford in general and in particular to the sites in the Proposed Plan. This local plan and the SHMA number have completely ignored these factors.

17) I object to a plan which proposes that over 70% of new housing be built within the Green Belt.
There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

18) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt.
The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

19) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there.
The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

20) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the proposed sites, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

21) I object to the fact that environmental concerns are not taken seriously in the Proposed Plans.
Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
Noise from current traffic levels is already a significant nuisance in many areas and the plan would add further noise to existing residents and introduce many new families of the proposed new housing to this existing level of unpleasant or damaging traffic noise. It is not necessary since there are better sites to build on than along the main traffic arteries where noise would be an unwarranted nuisance to neighbouring residents.

22) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan.
The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained.
and the village’s green spaces, including the FWA/TFM, protected.

23) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

It is more than clear that planning applications are unwarranted for all the many and detailed reasons given. Further such plans create an undue waste of public monies and are a serious distraction to residents who unfairly have to face over and over repeated threats to the enjoyment of residency in their borough.

I trust that these objections will be fully considered and the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9154  Respondent: 15479553 / Percy Warner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to add my objection to the proposed plan for the removal of Chilworth and other adjoining villages from the protection of the Green belt.

This is an A.O.N.B. and should remain so. I and many other local people have chosen to live here because of the quietness and unspoilt countryside which offers a great amount of peaceful walks. If Chilworth and other villages are removed from protection then this would result in more houses, people, cars, further congestion, fewer school places for children and pollution on our already over crowded ratrun roads. As the country has now voted for Brexit then hopefully not so many further homes need to be built so that we in the villages of the, Surrey Hills can still enjoy the peace and tranquility of this beautiful area which is the reason we moved here in the first place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13038  Respondent: 15479553 / Percy Warner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to you as I have grave concern that you are considering taking Chilworth out of the Green Belt, along with Shalford, Peasmarsh and many other villages. These villages were given Green Belt status, so they couldn't be subject to development. If you remove this, all our lovely green fields and peace and quiet would be removed and this is criminal.

We don't need houses built everywhere, whatever we are told. Even more so now with coming out of the EU, we certainly will not need the houses. Nobody has the right to live in the village they are born in, as years ago I had to move away and return years later when I could afford it and I found the new home I was happy to live in.

So I am asking you from the bottom of my heart to please reconsider this proposal to take Chilworth & the local villages out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2244  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2165  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2399  Respondent: 15479681  George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4699  Respondent: 15479681  George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5633  Respondent: 15479681  George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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| Answer (if comment is on questions 1-7 of the questionnaire): () | |
Attached documents:

Comment ID: PSLPS16/4325  Respondent: 15479681 / George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4588  Respondent: 15479681 / George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5558  Respondent: 15479681 / George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5602  
Respondent: 15479681 / George Smith  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4634  
Respondent: 15479681 / George Smith  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9155  
Respondent: 15479681 / George Smith  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9525  Respondent: 15479681 / George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9939  Respondent: 15479681 / George Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

I OBJECT to The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to development in areas which are at risk of flooding {Policy P4} such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.</td>
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<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
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</table>
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1825  **Respondent:** 15479681 / George Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1824  **Respondent:** 15479681 / George Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/1827  Respondent: 15479681 / George Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1819  Respondent: 15479681 / George Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

1. I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. a)The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. b)The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1821  Respondent: 15479681 / George Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1820  Respondent: 15479681 / George Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A50
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1826  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/541  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/537  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/539  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp171/538</th>
<th>Respondent:</th>
<th>15479681 / George Smith</th>
<th>Agent:</th>
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<td>Document:</td>
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</table>

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/4276</th>
<th>Respondent:</th>
<th>15479713 / Joanna E. Earle</th>
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</table>
Objections to Guildford Borough Council (GBC) Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brown field land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths, the lack of pedestrian footpaths and the space to provide either, together with the pitiful state of the existing highways, which are currently dangerous for cyclists
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and demand for car parking at each station is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish
to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>15479777 / Alexandra Trebilco</th>
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**I OBJECT to 2016 Draft Local Guildford Plan**

I object to a totally unrealistic number of houses for the country lanes to absorb.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9390  Respondent: 15479777 / Alexandra Trebilco  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers’ numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2248  Respondent: 15479809 / James Trebilco  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2168  Respondent: 15479809 / James Trebilco  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

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Attached documents:

Comment ID: PSLPS16/4328  Respondent: 15479809 / James Trebilco  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

Comment ID: PSLPP16/9158  Respondent: 15479809 / James Trebilco  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9534  Respondent: 15479809 / James Trebilco  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9391  Respondent: 15479809 / James Trebilco  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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<tr>
<td>I object to policy P2 green belt. I want to keep the green belt because we will have more oxygen and space to walk our dogs. I don't want the animals to have not very much space to find their food and drink.</td>
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Attached documents:

Comment ID: PSLPP16/9539  Respondent: 15479905 / K Dormer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9395  Respondent: 15479905 / K Dormer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2156  Respondent: 15479937 / William Pigram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
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Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I strongly object to the proposals in the Draft Local Plan for the following reasons:</th>
</tr>
</thead>
<tbody>
<tr>
<td>I live in East Horsley and find the roads</td>
</tr>
<tr>
<td>I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because the Green Belt is meant to be permanent and there are no special circumstances to justify development.</td>
</tr>
<tr>
<td>I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough, as illustrated by the 80% reduction from the 2013 to the 2015 Employment Land Needs Assessment.</td>
</tr>
<tr>
<td>I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the needed development can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.</td>
</tr>
<tr>
<td>I object to the proposed new interchange onto the A3 at Burnt Common because Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. Clandon would also suffer increased traffic to and from the south.</td>
</tr>
<tr>
<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3. This will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
</tr>
<tr>
<td>be very dangerous with even the current amount of traffic let alone if we get more traffic due to the increased population in Horsley and the surrounding areas. I notice there is a development proposal at the Thatchers Hotel on the Guildford Road East Horsley. This area of road is particularly dangerous as it has a blind corner and a sharp bend and many people having to turn right out of Ockham Road South onto it, all within the space of about 50 metres.</td>
</tr>
<tr>
<td>I object to all the proposals at the sites in West Hosley and East Horsley for the reasons of the local transport infrastructure simply not being able to cope with the huge demand the increased numbers of population will place upon them. In particular the stretch of the A3 from the M25 junction at Ockham past Wisley, past Burpham and all the way along to Guildford experiences many collisions. A new junction will increase numbers of traffic on this dangerous road.</td>
</tr>
<tr>
<td>In addition as a daily commuter into London from Horsley station I do not see how this small village station can cope with the increased demand from literally potentially thousands of extra commuters every morning and every evening travelling to and from the proposed sites in The Horsleys and at Wisley Airfield Ockham. The new Guildford Local Plan states expressly that regarding Effingham Junction station it is “not considered sequentially preferable or sustainable to direct office development to these locations”. See extract below. If it is not considered an adequate station where will the commuters residing at and office workers working in Wisley Airfield Ockham get the train to and from? Surely not Horsley as this will be having to cope with extra commuters from the 535 proposed new homes in the Horsleys.</td>
</tr>
<tr>
<td>4.4.17 For the purposes of the sequential assessment the train stations at Clandon, Chilworth, Gomshall, Shalford and Effingham Junction, will not be considered to be transport interchanges because of their locations within the Green Belt, AONB or the isolated nature of the station away from the village or centre. We do not consider that it is sequentially preferable or sustainable to direct office development to these locations.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9165  Respondent: 15479969 / W J Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

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Comment ID: PSLPP16/9541  Respondent: 15479969 / W J Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9396  Respondent: 15479969 / W J Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2255  Respondent: 15480033 / Tanya Wicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2174  Respondent: 15480033 / Tanya Wicks  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPS16/4335  Respondent: 15480033 / Tanya Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPP16/9166  Respondent: 15480033 / Tanya Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9543  Respondent: 15480033 / Tanya Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9397  Respondent: 15480033 / Tanya Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2256  Respondent: 15480065 / Annie Stanley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**I OBJECT to 2016 Draft Local Guildford Plan**

I object to a totally unrealistic number of houses for the country lanes to absorb.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9545  **Respondent:** 15480065 / Annie Stanley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the removal of villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9398  **Respondent:** 15480065 / Annie Stanley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Comment ID: PSLPA16/2258  Respondent: 15480097 / E Swapper  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID: PSLPA16/2178  Respondent: 15480097 / E Swapper  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID: PSLPS16/4337  Respondent: 15480097 / E Swapper  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/9168  Respondent: 15480097 / E Swapper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Comment ID: PSLPP16/9548  Respondent: 15480097 / E Swapper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPP16/9399  Respondent: 15480097 / E Swapper  Agent:
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Comment ID: PSLPA16/2257  Respondent: 15480129 / D Swapper  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/2177  Respondent: 15480129 / D Swapper  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9552  Respondent: 15480161 / D Crowcey  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9402  Respondent: 15480161 / D Crowcey  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being completely ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The site will suffer from constant low level noise and extremely poor air quality.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The significant congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already currently at full capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham and the Horsleys are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the three villages maintained and the villages’ green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2184  Respondent: 15480225 / Andrew Vovterhalter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooporate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4344  Respondent: 15480225 / Andrew Vovterhalter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/9176  Respondent: 15480225 / Andrew Vovterhalter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9556  Respondent: 15480225 / Andrew Vovterhalter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9406  Respondent: 15480225 / Andrew Vovterhalter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/4284</th>
<th>Respondent:</th>
<th>15480257 / Karen L Woodland</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being completely ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The site will suffer from constant low level noise and extremely poor air quality.

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2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2185  Respondent: 15480289 / Jemima Vovtherhalter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4346  Respondent: 15480289 / Jemima Vovtherhalter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

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Attached documents:

Comment ID: PSLPP16/9177  Respondent: 15480289 / Jemima Vovterhalter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9557  Respondent: 15480289 / Jemima Vovterhalter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9407  Respondent: 15480289 / Jemima Vovterhalter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/2159</th>
<th>Respondent:</th>
<th>15480353 / Seorais Graham</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand that the village of Shalford along with others near Guildford (Chilworth, Peasmarsh etc.) may lose their 'Green Belt' status as a result of the proposed Guildford Local Plan.

Whilst I appreciate the need for new housing, both locally and nationally, I can only foresee that this proposal will diminish these villages as planning decisions could ultimately become less well scrutinised, thus allowing for development that has not been evaluated sufficiently in terms of benefit for the local community.

The roads that serve Shalford, where I live with my family, are already prone to congestion and the village is at present delicately balanced with regard to local shops, housing and recreational facilities.

The village is historically significant with many Grade II listed buildings set in the beautiful Surrey Hills, an area of outstanding natural beauty. If this village, along with the others included in this proposal, are not in 'The Green Belt', then which, if any, villages can be considered to be worthy of this status?

Considering the above and other objections that have, I imagine, been submitted by other concerned individuals, I urge you to please reconsider this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/2267</th>
<th>Respondent:</th>
<th>15480417 / J Chequer</th>
<th>Agent:</th>
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</table>
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2186  Respondent: 15480417 / J Chequer  Agent:

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4347  Respondent: 15480417 / J Chequer  Agent:
I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9178  Respondent: 15480417 / J Chequer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9558  Respondent: 15480417 / J Chequer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9408  Respondent: 15480417 / J Chequer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2268  Respondent: 15480449 / A D R Lewis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2187  Respondent: 15480449 / A D R Lewis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4348  Respondent: 15480449 / A D R Lewis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9179  Respondent: 15480449 / A D R Lewis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9559  Respondent: 15480449 / A D R Lewis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9409  Respondent: 15480449 / A D R Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4286  Respondent: 15480481 / Jayne and Matthee Earl  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like it to be noted my objection against the proposed home new town in the Surrey greenbelt and have my name and my husband's name added to the petition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2270  Respondent: 15480513 / Janet Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2199  Respondent: 15480513 / Janet Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4349  Respondent: 15480513 / Janet Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
| Comment ID: | PSLPP16/9180  Respondent: 15480513 / Janet Graham  Agent:  |
|---------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
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| Comment ID: | PSLPP16/9560  Respondent: 15480513 / Janet Graham  Agent:  |
|---------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
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<p>| Comment ID: | PSLPP16/9410  Respondent: 15480513 / Janet Graham  Agent:  |
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Attached documents:

Comment ID: PSLPS16/4350  Respondent: 15480545 / L. Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Attached documents:

Comment ID: PSLPP16/9181  Respondent: 15480545 / L. Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Comment ID: PSLPP16/9561  Respondent: 15480545 / L. Graham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9411  Respondent: 15480545 / L Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Attached documents:

Comment ID: PSLPA16/2160  Respondent: 15480577 / E C Fairweather  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have the following objections to the proposed plan:

The proposed development of 48 houses at Thatcher's Hotel would severely impact on the already congested A246, particularly at peak times with drivers attempting to turn right out of the site. There is a strong potential for serious accidents to occur with vehicles exiting the petrol station at the same time. In addition, the density is out-of-keeping with the area.

The proposed travellers site on the old-telephone site, next to St. Martin's Close is particularly unsuitable due to the adjacent Care Home and sheltered accommodation. Many elderly people walk to Bishopsmead Parade and could find the site very intimidating.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2272  Respondent: 15480609 / R E Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPA16/2207  Respondent: 15480609 / R E Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPS16/4368  Respondent: 15480609 / R E Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPP16/9182  Respondent: 15480609 / R E Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Comment ID: PSLPP16/9562  Respondent: 15480609 / R E Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Attached documents:

Comment ID: PSLPA16/2211  Respondent: 15480641 / Gillian Battams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPS16/4370  Respondent: 15480641 / Gillian Battams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPP16/9185  Respondent: 15480641 / Gillian Battams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
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I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2164  Respondent: 15480673 / Simon Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year form the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4288  Respondent: 15480673 / Simon Broadhurst-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBE).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no street lights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough and particularly at the the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the environmental agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/2278  Respondent: 15480769 / Caroline Battams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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Comment ID: PSLPS16/4371  Respondent: 15480769 / Caroline Battams  Agent:

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Comment ID: PSLPP16/9186  Respondent: 15480769 / Caroline Battams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Comment ID: PSLPP16/9566  Respondent: 15480769 / Caroline Battams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPS16/4372  Respondent: 15480833 / Stuart Wittke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPP16/9187  Respondent: 15480833 / Stuart Wittke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Comment ID: PSLPP16/9567  Respondent: 15480833 / Stuart Wittke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I object to a totally unrealistic number of houses for the country lanes to absorb.

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<th>Respondent: 15480833 / Stuart Wittke</th>
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I object to the removal of villages from the Green Belt.

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Attached documents:

Comment ID: PSLPP16/9574  Respondent: 15480865 / Lisa Trenholm  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9417  Respondent: 15480865 / Lisa Trenholm  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/2282   Respondent: 15480897 / Graham Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2215   Respondent: 15480897 / Graham Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4374   Respondent: 15480897 / Graham Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9191  Respondent: 15480897 / Graham Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9570  Respondent: 15480897 / Graham Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9418  Respondent: 15480897 / Graham Smith  Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/2283  Respondent: 15480961 / Alex Smith  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
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Attached documents:

| Comment ID: PSLPA16/2216  Respondent: 15480961 / Alex Smith  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
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Comment ID: PSLPA16/2217  Respondent: 15481025 / Marion Kincses  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPS16/4376  Respondent: 15481025 / Marion Kincses  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPP16/9200  Respondent: 15481025 / Marion Kincses  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
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Comment ID: PSLPP16/9576   Respondent: 15481025 / Marion Kincses   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9420   Respondent: 15481025 / Marion Kincses   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Comment ID: PSLPP16/9205  Respondent: 15481057 / P M Stephens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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Comment ID: PSLPP16/9568  Respondent: 15481057 / P M Stephens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9421  Respondent: 15481057 / P M Stephens  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Comment ID: PSLPA16/2219  Respondent: 15481089 / Ann Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Attached documents:

Comment ID: PSLPS16/4379  Respondent: 15481089 / Ann Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9210  Respondent: 15481089 / Ann Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/9569  Respondent: 15481089 / Ann Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Attached documents:

Comment ID: PSLPP16/9422  Respondent: 15481089 / Ann Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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Comment ID: PSLPA16/2221 Respondent: 15481185 / Ray Avery Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4380  Respondent: 15481185 / Ray Avery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9572  Respondent: 15481185 / Ray Avery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9423  Respondent: 15481185 / Ray Avery  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/2285 | Respondent: 15481217 / C R Avery | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPA16/2220 | Respondent: 15481217 / C R Avery | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/4381</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/9221</th>
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</table>

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9573</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9424  Respondent: 15481217 / C R Avery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2162  Respondent: 15481281 / Simon Tolchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object especially to policies A35-41:

- Amount of new housing far exceeds local need
- Housing density excessive when compared with existing development
- Would transform the Horsleys into a sizable town, something for which no case is made
- No local support
- Collective impact of these 6 sites on a small part of the borough appears not to have been considered
- Key infrastructure is lacking with no adequate provision
- Green Belt gap with neighbouring settlements hugely narrowed
- Site A35 has surely been included in error given that it was rejected by the Planning Committee?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2163  Respondent: 15481281 / Simon Tolchard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to redevelop the Howard of Effingham School is unjustified. The school has confirmed that it does not plan to change its catchment area, and can only be described as oversubscribed when demand from outside the catchment area is taken into account. A new school is therefore clearly not a strategic need and as such should not appear in the Local Plan, which by definition is a document of strategy. It is important to note that the record of the meeting on 31 March between EPC and GBC shows that Cllr Mansbridge stated that any proposal for redevelopment of the School would NOT be included in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4287  Respondent: 15481281 / Simon Tolchard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The disproportionate plan to build 2100 homes north of Ockham would take yet more land out of the Green Belt, which is unacceptable for the reasons outlined above. Greater pressure would be placed on local roads, including those in Effingham which are already congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9224   Respondent: 15481281 / Simon Tolchard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- It is essential that infrastructure improvements are confirmed and fully funded before decisions are taken on proportionate housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9245   Respondent: 15481281 / Simon Tolchard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Parking is available at Effingham Junction station. Building upon the Common and allowing motor vehicles to access the common would contravene a number of Acts (1857 and 1875, the Commons Act 2006 and the Road Traffic Act 1988). Rare insect and bird life would be irrevocably damaged by development works.

- The Local Plan will shape the future of our historic village and our borough. Please listen to the views of the residents. I would be pleased to see a revision to the Local Plan which preserves the Green Belt and results in proportionate development on suitable sites, supported by infrastructure improvements.
Green Belt is not for the Council to give away; it belongs to us all and not just those who live within it, yet the detail of the policy suggests the Council is willing to sacrifice it. There is no commitment within this plan to protect the Green Belt, contrary to the content of the NPPF, party manifesto commitments, government policy and previous responses to public consultations.

There is no assessment of the Green Belt’s value, yet losing it results in an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF).

The draft Local Plan suggests that most Guildford villages do not contribute to “openness”, however this is subjective. Indeed, preserving the openness of Effingham is a cornerstone of their emerging Neighbourhood Plan and fits with Paragraph 17 of the NPPF which ‘empowers local people to shape their surroundings’. I am especially concerned by the proposed ‘insetting’ of 14 villages from the Green Belt, and ‘infilling’ 12 of the borough’s Green Belt villages. It is of great concern that settlement boundaries are proposed to be extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is completely inappropriate, given the stated objectives of the Green Belt in the NPPF and government policy. No exceptional circumstances have been disclosed, and therefore the Green Belt boundaries should NOT be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9223  Respondent: 15481281 / Simon Tolchard  Agent:
The Local Plan proposes 13,860 new homes to be built across the borough by 2031. This figure is said to be based on an objective SHMA carried out by GL Hearn, consultants whose website openly proclaim their pro-development agenda. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it, despite repeated requests for debate. The assumptions and calculations underlying the model have not been disclosed, protected by a claim to intellectual property. The Council say we should ‘trust the contractors’ model because it is used by a large number of other local authorities’; however this is no guarantee of objectivity. Indeed, at least two recent papers have been published (one by Guildford Greenbelt Group Councillor David Reeve and the other by an independent expert commissioned by the non-political Guildford Residents Association), which challenge the findings of the SHMA.

Furthermore, the housing number is based on projections for economic and population growth pre-BrExit, including migration. These projections should now be revised downwards, possibly quite significantly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</th>
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<tbody>
<tr>
<td>• The “objectively assessed need” figure of 693 homes a year is too high.</td>
</tr>
<tr>
<td>• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.</td>
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<tr>
<td>• The current SHMA inflates the proposed housing figure due to</td>
</tr>
<tr>
<td>    ○ failure to correct for errors in the historical data for international migration flows,</td>
</tr>
<tr>
<td>    ○ issues with the way it considers students and affordability and</td>
</tr>
<tr>
<td>    ○ flaws in the method for estimating the number of homes needed to support job growth.</td>
</tr>
<tr>
<td>• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.</td>
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</tbody>
</table>

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2193</th>
<th>Respondent: 15481409 / Amy F Corstin</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.</th>
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</thead>
<tbody>
<tr>
<td>1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever</td>
</tr>
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</table>

2135
since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is gridlocked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9298</th>
<th>Respondent: 15481409 / Amy F Corstin</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/9341</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9347  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9280  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9292  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9359  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward-looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9322  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT** to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9304  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9310  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT** due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9316  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9268  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/9274  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9261  Respondent: 15481409 / Amy F Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1265  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1271  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>15481409 / Amy F Corstin</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** SQLP16/1283  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSPLP16/9426  **Respondent:** 15482241 / Sarah Crawcour  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the ‘insetting’ of local villages and to the horrific overloading of the A3 proposed by the developments in this plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
As a resident of West Horsley I would like to register my objection to the new Guildford Plan. I object to the proposal for the following reasons:

- I feel that tinkering with the green belt boundaries, to extend land available for building houses, is a travestying misuse of power.
- The Green Belt was agreed to protect the beautiful countryside and the unique character of villages such as East and West Horsley and preserve it for future generations I object to this misuse of power.
- The local infrastructure is unable to cope with the proposed number of new residents; schools and primary healthcare would all be affected by an increase in the population negatively impacting on the well-being of residents.
- Current residents have difficulty securing places for their children in primary schools.
- The number of vehicles using local roads is currently pushing the boundaries of acceptability and increase would quickly tip the balance creating danger for children, young people and other vehicles.
- The kind of machinery needed for extensive building increases the dangers, in particular Tipper Trucks employed to remove earth are often driven very dangerously and at great speed.
- The roads are already in need of repair; damage caused by the increased volume of building related traffic would be devastating.

I believe the New Guildford Plan lacks probity and does not concede any ground to the residents concerns registered in past consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a local resident and member of the Hogs Back residents association I write to register my strong objection to Guildford's local plan site allocation A26 (Blackwell Farm). Whilst I accept the need for additional housing around Guildford I object on 3 counts:

First the new junction that will connect the site to the A31 will increase the congestion on an already very busy road. East bound traffic along the eastern end of the Hogs Back is frequently stationary for miles in the peak morning periods and any junction will only exacerbate the situation.

Secondly, having worked on the Research Park for 15 years, despite the recent work on the Egerton Road junction, the site cannot handle the volume of traffic at peak times and frequently becomes gridlocked. Further expansion will only make this worse and more frequent.

Thirdly, the site is adjacent to an Area of Outstanding Natural Beauty, and I understand it may be re-designated as part of it. As such any development will be very detrimental to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2228  **Respondent:** 15482369 / Klaus Eckhart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe that Chilworth should lose its Green Belt status.

Currently Chilworth is gridlocked twice a day during school term time due to the amount of traffic that reduces movement to single line traffic. Furthermore the Blacksmith Lane road through to Guildford is also inundated with traffic as parents use this road to take their children to schools in Guildford. Chilworth also has an enormous amount of through traffic from the A248. If there is to be large scale building of houses on either side of the village this will only magnify the problem even more. The infrastructure cannot absorb any more traffic, or an increase of population, without completely destroying the village.

The Green Belt must be preserved and not destroyed by unsightly new building projects. The current infrastructure cannot cope with any more expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4353  **Respondent:** 15482401 / Bernard Kelly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the foregoing on grounds which include the following:

The Former Wisley Airfield should not have been removed from the Green Belt – the proposed development would create an urban corridor from London to Guildford. There are no exceptional circumstances justifying removal from the Metropolitan Green Belt. The proposed housing density will severely impact the nearby localities – Ockham, Ripley, the
Horsleys and Effingham. In particular, the proposal will have a devastating impact on Ockham, a hamlet on open land, which would be subsumed into an area of high population density.

2 Further, the proposal would have an adverse impact on transport, local roads and road safety, and danger on the narrow local roads. Far from encouraging local cycling and walking, it would increase the danger.

3 There would be an increase in the already severe traffic congestion on the A3, M25 and some local roads.

4 There is a lack of local transport, and the local railway stations could not cope, while use of stations further afield would add to congestion and pollution. The risk of increased air pollution has not been properly addressed.

5 The area is a haven for wildlife, which would be seriously endangered.

In short, although this proposed development would undoubtedly benefit developers who are, I believe, operating out of a tax haven, I cannot see how it would benefit the area concerned. Although living in Cobham, I believe I have a greater interest in the area concerned than those living on the far side of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2237  Respondent: 15482657 / S Harkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to our villages being taken out of the Green Belt. This is an area of outstanding beauty for all to enjoy including those who live in towns.

The infrastructure is not there for increased use of poorly maintained roads. Overfull schools, shortage of car parks.

The drainage is poor with flooding in many places when it rains heavily.

I do wonder whether people from planning actually come and look at the area in question.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4382  Respondent: 15482721 / John Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Page 2163 of 2543
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have worked at RHS Garden Wisley for nearly 10 years, and have lived in Surrey all my life, at contrasting locations such as Croydon, Dorking and Haslemere. I have personal experience of the housing market as a Surrey resident, as do my children. I earn below the national average income and choose to live here because it is beautiful, even if it means sacrificing some life-style choices. I do not want to see this area ruined and become suburban sprawl and a biodiversity desert. I have not seen prices in the rental and buying market rise very much at all over the last five years - indeed I believe they have just fallen following the brexit vote. The devaluing of the pound has suddenly made us an even more attractive market for foreign investment: this is trend does not support the apparent housing problem. We've yet to see the effects of the buy-to-let changes. The Green Belt is as necessary here as the parks are to London. I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9481   Respondent: 15482785 / Rigas Petri   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objection for the Guildford plan 2016
which will remove Green belt status of our beautiful village Chilworth

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2275   Respondent: 15482817 / C.E. Pullen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to:

0 failure to correct for errors in the historical data for international migration flows,

0 issues with the way it considers students and affordability and

flaws in the method for estimating the number of homes needed to support job growth.

0 It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough; it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. OBJECT to Gosden Hill development being in the Local Plan

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4391  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4392  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9494  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the sustainable employment policy (Policy E1).

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehouse and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9513  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9499  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9507  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9509  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
## Comment ID: PSLPP16/9484  
**Respondent:** 15482817 / C.E. Pullen  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

### 1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send, and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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## Comment ID: PSLPP16/9485  
**Respondent:** 15482817 / C.E. Pullen  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well, I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly, the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9482  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9483  Respondent: 15482817 / C.E. Pullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly consi It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migrati These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification on to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4384  Respondent: 15482849 / B Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The University of Surrey has already desecrated Manor Farm by building on land originally designated as Green Belt. The Green Belt status was removed due to the University advancing the argument their "Special Circumstances" as an educational organisation needing more accommodation for its students, etc. It has not built accommodation for 1,500 students for which it has planning permission but instead pursued its "for profit" ventures on the site.

After building an under-used Park & Ride, an International Sports Centre and Veterinary School the University has still not built 1,500 student houses on Manor Park for which it has planning permission. Instead students occupy over 1,500 houses in the area and in Guildford town which could be available for local residents, students add to traffic and parking issues for local residents.

Instead of fulfilling the already approved planning for student houses on Manor Farm, more student houses were built on the former Unigate Dairiesite which is close to Guildford Station. This provision for students has denied local residents who work in Guildford town or further afield the opportunity of walking to work or to the train or bus station thus reducing pollution from vehicle emissions and reducing vehicle movements. This property alone could have provided housing for several local residents and their families.

The University's proposed development on Blackwell Farm will further erode Green Belt and affect the visual amenity of the Hog's Back Area of Outstanding Natural Beauty. A ministerial statement is clear that constraints such as Green Belt, AONB, etc. must be considered. The following Government on Green Belt Guidance announcement stated:

“The framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse Impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and or designated as sites of special scientific interest; land designated as greenbelt, local green space, an area of outstanding natural beauty, heritage coast or with a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion”.

The adverse impacts of the University building such a large development on Blackwell Farm in terms of harm to the Green Belt and AONB demonstrably outweighs the benefits of providing land for housing and employment. Much of the Blackwell Farm development is a profit making exercise, like Manor Farm where the Farm was purchased by the University with Green Belt restrictions; the University then used its might and influence to have that restriction removed.

In addition:
- Blackwell Farm is still an agricultural farm providing valuable crops without the need to incur costs of importing this food e.g. 1 acre of land can produce up to 2.5 tonnes of wheat, etc.;

- The University has already made plans to develop Blackwell Farm by restricting public access to recreation on their land of the public footpaths and bridleways. What action has been taken to reinstate access when the University is breaking the law?

- If the University is allowed to build on Blackwell Farm we will all lose the visual amenity of this Area of Outstanding Natural Beauty and Green Belt forever; the setting will be urbanised.

- The development will create intense areas of light pollution, not only from the numbers of houses but from the University’s security for the additional Research Park units they intend to build.

- The retail units they intend to build will further affect small local shops.

- The development will be in an area totally disassociated from Guildford Town, and any new residents on Blackwell Park will naturally travel into Guildford household needs, adding to any already congested traffic system.

- There will be extra demands on public services, including the Royal Surrey County Hospital; increased traffic congestion will impede safe passage and increase and affect response times for ambulances attending the Royal Surrey County Hospital.

- Pollution from vehicles and central heating systems will affect the environment around the proposed Blackwell Farm development.

1. Included in the major significant factors to OPPOSE the University's plan to develop on Blackwell Farm. Is the lack of immediate improvements to the infrastructure. Before any large developments are considered, infrastructure must come first; it is already overstretched.

The traffic along the A31 Hog's Back is already at stand still at peak hours.

- The University's plan for Blackwell Farm is to include new schools in the development. This will further increase the volume of traffic at peak times.

- No provision has been made for cycle tracks along the A31 which could provide a safe Route for environmentally minded members of the public to cycle to the Surrey Research Park/Hospital, etc. from Farnham to Guildford and Guildford to Farnham.

There are plans to build more houses between Normandy and Flexford and in Frog Grove lane at the proposed SANG site. Additional traffic from these developments from the West is likely to add to the congestion on the A31 and the A3 and rat runs through local roads and lanes.

There is no mention of the provision of slip roads for safe access for house holders living on each side of the Hog's Back. How are we supposed to safely enter/exit this highway during the hours when traffic is moving at motorway speeds? With the additional traffic volumes that will be generated, it will be untenable.

- There is no mention of provision of safe access for pedestrians who cross the A31 to the bus stop and walkers using the public footpaths which cross the A31 Hog's Back.

We note that an air pollution survey was carried out at the top of East Flexford Lane/A31 earlier this year (presumably at the University's behest). If the statistics are used to countermand complaints about an increase of air pollution they should be taken in the context of the increase in traffic that a development at Blackwell Farm will generate; also in the winter we see and smell the emissions from vehicles in the "A31 Car Park" in the mornings rolling off the Hog's Back into the fields, into Blackwell Farm and surrounding properties along the Hog's Back. Building on this Green Belt area will remove Green lungs which counteract the effects of traffic pollution.
There is frequent badger roadkill on the Hog's Back.

The additional traffic will create even more noise disturbance from the Hog's Back for wildlife.

The proposed traffic light system at the top of the Farnham Road/Down Place will create more of a back-log along the A31; queues at peak times already extend westwards beyond the B3000. How is the traffic joining from new housing in Normandy/Flexford and the SANG at Frog Grove lane going to join the A31?

- Drivers impatient to reach the A3 already drive along the fastlane and "cut in" just before the slip road onto the A3. This is the cause of accidents and "shunts" which have inappropriately been attributed to the gap in the central reservation in the A31 at the East Flexford lane and Monks Hatch junction. The sec Highways state, as a safety measure, "Queues Ahead" signs have been erected before the A3 sliproad on the A31. However, these are only just beyond the Junction at East Flexford lane, just before the A3 sliproad. By the time drivers reach these signs, they are already IN the queue at peak times.

Should the University's plans for Blackwell Farm be approved the benefits of income from Community infrastructure Levy contributions are likely to be absorbed by making provision of another SANG instead of improving the already overloaded and congested infrastructure around Guildford.

The appalling congestion around and into and out of Guildford must cost businesses dearly.

Approving planning for this huge development on Blackwell Farm is ill-conceived and only serves to put more money into the University's and others coffers and not benefit Guildford in the many respects I have referred to in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see attached letter regarding my objection to the proposed Normandy/Flexford development.

I hope for GBC to commit to not undertaking the development to preserve the valuable Green Belt land and more equitably share development throughout the area.

I would like to strongly display my objections to the proposed development on the land South of Normandy and of that North of Flexford, which has been indicated as the site of potentially substantial development.

Reasons for objection:

• The site lies within the Green Belt area and has been previously indicated as being highly sensitive in previous assessments, playing host to a variety of wildlife and in line with the purpose of Green Belt land should be preserved to prevent further encroachment of the urban sprawl.
• The development does not particularly fill any sustainability criteria, both environmentally and socially in line with that defined within policy frameworks.
• The area identified has not been subject to any indication of how the highways, railway and other infrastructure would be impacted. The significant scale of the proposed development indicates all infrastructure, transport and inclusive of drainage would be unable to cope, with little indication of improvements being provided that wouldn’t further affect the lack of sustainability this proposed development promises.
• The site was previously safeguarded providing no opportunity for discussion beforehand, displaying the value of this green belt land. The council has now failed to identify the value of this land and the opinion of the residents before proposing such a large scale development.
• The argument regarding the need for a school is circular, having little solid basis, other schools within the area are undersubscribed and there are a number of alternative sites and situations to solve the issues with a school which do not pose the problem of remoteness nor affect the green belt.
• The requirement for this development and housing is not based on the required exceptional circumstances to comply with policy and legislation required to develop Green Belt land with what appears to be wholly unsuitable and lacking evidence as to the true need of the school and housing.

Guildford Borough Council has seemingly proposed this development for its own ease having little regard for other factors. Manageable development is required within this area and there are a number of sites which would likely be more suitable. The sharing of disruption, pressure on infrastructure through mixed development throughout the whole of GBC area would be a much greater reflection of demand and would provide a more effective, sustainable and holistically economically viable options.

I feel there is a lack of sound justification or understanding regarding this development and strongly object to the design, scale and location of this proposed development. I hope to hear the confirmation from GBC that this development will not be undertaken and so to preserve the vital green belt land, maintain some of the character of the area and allow for more sustainable development throughout the GBC area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Development Objection Letter (2).docx (23 KB)
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<th>Comment ID: PSLPP16/9493</th>
<th>Respondent: 15482977 / Craig Robertson</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to this policy. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. We would be losing countryside for no local benefit.</td>
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<td>I OBJECT. This policy allows potential development outside settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This would allow development where it would not otherwise be permitted. The policy wording needs to explicitly limit rural exceptional to cases of demonstrable, unfilled, local need that cannot otherwise be met, providing proof of “very special circumstances”.</td>
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I OBJECT to this policy as it stands. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England and will take years to agree and complete. The draft plan commits to building massive housing estates in the countryside before any of these road improvements are in place. Surrey is the most congested county in England, with 683 people per square kilometer, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9496  Respondent: 15482977 / Craig Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. The Surrey Hills needs much more substantial protection.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9491  Respondent: 15482977 / Craig Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development and is therefore unsustainable. This should represent an absolute constraint on development.
Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections, setting a clear boundary to planning decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9492  Respondent: 15482977 / Craig Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal to build 13,860 new homes during the plan period (2013-33). The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA). It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

I OBJECT to the plan to identify 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Show people within Guildford borough between 2012 and 2017, and an additional permitted 30 pitches and 2 plots, or any new target as identified within an updated Traveller Accommodation Assessment, between 2017 and 2027. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4388  Respondent: 15483009 / S Acomb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants .

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon, Burpham, Merrow and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/9505  **Respondent:** 15483009 / S Acomb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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Comment ID: PSLPP16/9502  **Respondent:** 15483009 / S Acomb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9500 Respondent: 15483009 / S Acomb Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9501  **Respondent:** 15483009 / S Acomb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/4399</th>
<th>Respondent: 15483457 / Daphne Crispe</th>
<th>Agent:</th>
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<td>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)- Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</td>
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<td>I object to the draft local plan for the following reasons-</td>
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<td>I object to the detrimental effect on transport of so many extra cars. The roads are already overcrowded and congested and greater numbers would bring traffic to a standstill at busy times (rush hour &amp; school arrivals &amp; departures). Added to which the East Horsley Station car park was already FULL by 10am on my last 3 attempts to find a place before the start of the summer holidays. Where do you go? There are no long term car parks in Horsley within reach of the station. Infrastructure must come first.</td>
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<th>Comment ID: PSLPA16/2294</th>
<th>Respondent: 15483489 / Mary K Main</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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I OBJECT to the Local Plan proposal to take the Horsleys and neighbouring villages out of the Green Belt. There are no exceptional circumstances to warrant such an action.

Whilst accepting that there is a need for some additional housing, I strongly OBJECT to the proposal to build as many as 593 additional homes in a settlement of about 3000, which is the present size of the Horsleys.

The projected housing requirements for the Borough do not have any basis which has been defined. No proposal should be put forward for consideration until it is made clear why a certain number of dwellings are required and the reliability of this projection.

Before adding to the population of the Horsleys, the infrastructure must be upgraded. Local education and medical facilities must be made capable of expansion. Currently, the roads are inadequate for the traffic which uses them. If the population is really going to take to riding bicycles (or tricycles) as a regular form of transportation, then the provision of a network of cycle tracks is an essential precursor.

Mixing cyclists and motor transport is dangerous and severely disrupts the normal flow of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/4521</th>
<th>Respondent:</th>
<th>15483521 / Indigo Planning Limited (Tania Tindale)</th>
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<tr>
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Introduction

These representations have been prepared on behalf of Guildford College Group who own Land at Liddington Hall in Guildford, in response to Guildford Borough Council’s consultation on its Proposed Submission Local Plan (Regulation 19).

The full extent of the site is shown in Appendix 1.

These representations supplement the original written representations submitted in September 2014 on behalf of Guildford College Group in respect of Land at Liddington Hall in response to consultation on the Regulation 18 version of the Draft Local Plan. A copy of the original representations is provided at Appendix 2.

A detailed description of the site and its surroundings is contained in paragraphs 3.7 to 3.10 of the earlier representations.

The following additional technical documents have also been prepared in support of these representations:
- Design Document, prepared by LDA Design; and
- Sustainability Note and accompanying plans, prepared by Vectos.

A copy of both technical reports is provided at Appendix 3 and 4.

The Guildford College Group and the Liddington Hall Site
The Guildford College Group (comprising Guildford, Merrist Wood and Farnham Sixth Form Colleges) is the largest College of Further and Higher Education in Surrey and one of the largest employers in the Guildford area.

The College Group covers all government funded sectors: general further education, higher education, land-based and sixth form. It currently enrols around 10,000 students per annum made up of school leavers, apprentices, adults and employers onto a broad curriculum across 15 sector skills areas, with courses ranging from supported learning/entry level to degree level programmes.

The College works with over 1,500 local employers, as well as universities, schools and other stakeholders to meet skills needs and currently has around 700 apprentices. With its broad offer which includes community outreach and special needs, the College has a positive social as well as an economic impact on the local community.

Although well-regarded, some of the facilities at Guildford and Merrist Wood have fallen behind other colleges and are no longer fit for purpose by modern teaching standards. This restricts the College from being able to develop its curriculum to meet the needs of the Local Enterprise Partnerships’ future skills agenda.

The College has no direct access to further funding to facilitate these future vital improvements and therefore needs to look to alternative means for investment. The only way the College can fund the improvements is by selling some of its own assets and reinvesting the money back into the programme of works.

The College believes that improvements to the facilities would allow them to increase and diversify the curriculum offer, thereby increasing student numbers and also enabling them to draw more revenue from commercial interests, which in turn would make them more self-sufficient in terms of future funding.

To allow this to happen, they are reliant on bringing forward a sensitive and suitable residential development at Liddington Hall as an urban extension to Guildford. A Site Location Plan of the site is provided at Appendix 1.

Guildford College are relying on funds being from the future sale of land at Liddington Hall to secure much needed improvements to its main Guildford and Merrist Wood campuses.

Consequently, Guildford College has been promoting their site, Liddington Hall through the Local Plan process for the past few years. The earlier (Regulation 18) version of the Draft Local Plan identified Liddington Hall as a potential housing (650 homes) and travellers site (site ref. 78 in Land Availability Assessment February 2016).

However, Liddington Hall has been removed from the latest Proposed Submission (Regulation 19) version of the Local Plan. This is surprising given that:

- The site is in a sustainable location on the edge of Guildford and within easy reach of the Fairlands Estate. It is well-served by local bus routes with good cycling connections to the town centre. It is within walking distance of the local facilities in Fairlands;
- In view of the potential capacity of the site (as acknowledged by the Council) for approximately 600 dwellings, there is the potential to further enhance the connectivity of the site for sustainable modes of transport as part of any redevelopment of the site;
- The existing footpaths already connect the site back in to adjoining residential areas;
- The site is effectively surrounded on three sides by existing development and two streets of existing development extend into the site from Aldershot Road;
- The substantial tree belts and small copses on the western and southern boundary, together with the settlement edges and road corridors on the northern and eastern boundaries establish a sense of containment to the site;
- The site has clear defensible boundaries and an appropriate Masterplan for the site could provide a robust green edge;
- The site has a very limited role in preventing the merging of Guildford and Fairlands;
- The site has only a limited role in containing the sprawl of urban areas;
- The site plays no role in preserving the setting and special character of an historic town;
- The site is not subject to any landscape-related, ecological, archaeological or heritage designations;
- None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);
- The site is not a flood zone;
• The land is under single ownership (the college). The college would be committed to bringing forward the site as soon as the Plan is adopted;
• Residential development of the site would be compatible with adjacent residential land uses;
• There is sufficient existing highways capacity to accommodate development;
• Appropriate access into the site can be achieved; and
• The site is available for development and deliverable within 1-5 years, with no insurmountable obstacles to delivery in terms of infrastructure, highway improvements, ground contamination or ecology.

Soundness

Paragraph 182 of the National Planning Policy Framework (NPPF) states that a local planning authority should only submit a plan for examination which it considers to be ‘sound’, namely that it is:

• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The representations demonstrate that the Draft Plan as currently worded is not sound because:

• It is not positively prepared as it fails to adequately meet Guildford’s housing need and does not aspire to exceed minimum requirements and build in flexibility;
• It is not justified as it is not based on a robust spatial strategy to meet housing need;
• It is not effective as it is unlikely to deliver enough new homes over the Plan period and at the right time; and
• It is not consistent with National policy or planning practice guidance as it focuses on the protection of the Green Belt over the presumption in favour of sustainable development and the environmental capacity of sites to accommodate appropriate development and the proper distribution of development around the Borough.

In these representations we set out the changes which will need to be made to the Plan to make it sound, including the re-insertion of our client’s site, land at Liddington Hall as a site allocation.

The case for Liddington Hall

Green Belt Sensitivity

As confirmed in the LDA Design Green Belt Assessment (Appendix 3) the site has a very limited role in preventing the merging of Guildford and Fairlands and also in containing the sprawl of urban areas. Furthermore, it plays no role in preserving the setting and special character of an historic town.

Removal of the site from the Green Belt would not compromise the integrity and screening function of retained vegetation despite a narrowing of the physical gap between settlements.

As demonstrated by LDA Design a new permanent and definable boundary could be established along Gravetts Lane and the A323 which would be more effective in the long term in preventing further creep of development into the more sensitive rural landscape to the west.

Sustainability credentials

The Green Belt Volume II Addendum at Appendix 6, gives Liddington Hall a total sustainability score of 8.57 and ranks it 8 out of the 16 appraised sites. Based on this scoring and ranking it decided to include the site in the earlier iteration of the Local Plan.
Vectos have carried out a review of the sustainability of the Liddington Hall Site compared to the other key strategic sites being progressed by the Council and have demonstrated that Liddington Hall is in a more sustainable location, in transport terms, compared to these sites, with scope to deliver meaningful transport improvements.

It is well-served by local bus routes with good cycling connections to the town centre. It is also within walking distance of the local facilities in Fairlands.

The site already benefits from footpaths which connect the site back in to adjoining residential areas. These could be upgraded as part of any redevelopment to enhance pedestrian and cycle connectivity further.

In view of the potential capacity of the site (as acknowledged by the Council) for up to 600 dwellings, there is the potential to further enhance the connectivity of the site for sustainable modes of transport as part of any redevelopment of the site.

**Environmental Capacity**

The Liddington Hall site scores well in terms of its Environmental Capacity. The Council has acknowledged in its own Environmental Capacity Analysis (Appendix 3 of Guildford Borough Green Belt and Countryside Study Volume II Addendum) that:

- There are no landscape related designations on any of the land parcel;
- There are no archaeological or heritage designations in place on the land;
- None of the land lies within an area liable to flood;
- None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);

In view of lack of constraints the Council have identified that the majority of the open land within the site comprises a potential development area with an estimated capacity of 600 homes.

**Deliverability**

Land at Liddington Hall has been in the single ownership of the Guildford College Group for 50 years and therefore the site is available for development immediately (ie within Year 1-5 of the Plan Period) without any insurmountable obstacles to delivery.

The site has been promoted through the Local Plan process over a number of years, and has previously been identified as a suitable location for housing within previous iterations of the Land Availability Assessment (LAA) subject to release from the Green Belt;

Not only would the funds raised by the disposal of the land be entirely re-invested to provide improvements of Guildford College, the redevelopment of the site would help plug the gap in the earlier phases of the plan period.

**Summary**

For all of the above reasons we consider that land at Liddington Hall should be re-inserted as a site allocation under Policy S2 of the Plan.

**Conclusions**

The Draft Plan as currently worded is not sound because:

- It is not positively prepared as it fails to adequately meet Guildford’s housing need and does not aspire to exceed minimum requirements and build in flexibility;
- It is not justified as it is not based on a robust spatial strategy to meet housing need;
- It is not effective as it is unlikely to deliver enough new homes over the Plan period and at the right time; and
- It is not consistent with National policy or planning practice guidance as it focuses on the protection of the Green Belt over the presumption in favour of sustainable development and the environmental capacity of sites to accommodate appropriate development and the proper distribution of development around the Borough.
In order to prepare a sound Core Strategy, the council should plan for more homes with greater flexibility and selection of sites should be based more on the purported spatial strategy adhering to sustainable development rather than the slavish protection of Green Belt. In any event, the Green Belt Assessment should be re-examined in terms of methodology and results. This would result in a more rounded and robust selection of sites, including the re-insertion of land at Liddington Hall as a site allocation under Policy S2 of the Plan.

Examination in Public

We wish to appear at the forthcoming Examination in Public to present our case on this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 22680003_Land_at_Liddington_Hall_Part3.pdf (8.8 MB)
- 22680003_Land_at_Liddington_Hall_Part2 (1).pdf (9.4 MB)
- 22680003_Land_at_Liddington_Hall_Part1 (1).pdf (1.1 MB)
- 22680003_Land_at_Liddington_Hall_Part4.pdf (8.0 MB)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Introduction

1.1. We act on behalf of the Guildford College Group in relation to their Merrist Wood College campus. Merrist Wood is a landbased college, which trains skilled workers for agricultural and horticultural industries.

1.2. The Merrist Wood campus is a long established college and the only land based college in Surrey. It extends over 400 acres, with a wide range of built facilities covering over 12.7ha including teaching blocks, student accommodation, glasshouses, workshops, sports pavilions, and one of the largest indoor equine arenas in the south east. The College is broadly split between the northern and southern campuses.

1.3. Merrist Wood College (MWC) is a 162ha, multi-award winning College which specialises in the land-based industries. The College is widely recognised by industry specialists for its training and for its past successes at RHS Chelsea and more recently at the Hampton Court Flower Shows; with work from the estate known across the country and in other parts of the world. The College has a national and international reputation amongst employers and industry specialists and a long history of providing education in the land-based sectors. In the College’s last Ofsted inspection they were graded as having “outstanding provision in land-based, equine and animal care”. Inspectors commented that there is “very good academic and pastoral support” and “curriculum enrichment, including work experience, visits and external speakers, is strong”.

1.4. The existing educational facilities at MWC include a large, diverse animal management centre which has both domestic and exotic animals; specially designed studios and workshops for floristry (horticulture), garden design and landscaping (with ancillary retail); workshops and classrooms for maintenance of agricultural machinery and equipment (vehicle technology); equine care and livery (currently with accommodation for over 70 horses); an indoor riding arena which is one of the largest of any college in the country; student classrooms, computer technology suites, a student library and associated ancillary student facilities including a restaurant, etc.; a working farm; and, on-site student and staff
residential accommodation. The College also provide outdoor sport activities for its students and the wider community, which includes an existing affiliation with Chelsea Football Club wherein one of their ‘soccer academies’ is run from the land at MWC.

1.5 The College are developing ambitious plans for the future. Having recently invested £1m at their Farnham Sixth Form College site in the last three years they are now looking to further heavily invest in the redevelopment and enhancement of the Merrist Wood Campus in the coming years.

1.6. There is a continuing need to rationalise, modernise and grow the college campus to cater for an expanding educational offer and the anticipated growth. The College has suffered from under-investment for a number of years. With a renewed emphasis on modernising the educational offer at Merrist, the College are currently exploring development plans with the council through the pre-application process to expand and modernise the campus. These current development plans will ensure that the college is allowed to maintain and improve its facilities and realise capital funds, to secure its long term future. This evolution and growth of the campus will continue into the future.

1.7. It is therefore important that the emerging Guildford Borough Local Plan allows for the continual evolution and current growth plans for Merrist Wood. Our contention is that the Merrist Wood campus should be inset from the Green Belt as has been proposed for other major developed sites in the Green Belt. The Merrist Wood campus is larger, with more built development than many of the other major developed sites that have been proposed to be inset from the Green Belt. The campus is well contained in the landscape with opportunities on its own land to strengthen defensible boundaries.

2. Policy Background

2.1. The status of Merrist Wood as a major developed site in the Green Belt has been recognised in successive versions of the Local Plan.

2.2. More recently, draft Policy 9 ‘Villages and major previously developed sites’ of the Draft Local Plan (Regulation 18 – July 2014) gave recognition to previously developed sites in the Metropolitan Green Belt. It stated that development should help support the present and future economic, environmental and social sustainability of rural settlements in the Borough.

2.3. Two levels of major previously developed sites were referenced. Firstly, sites including Mount Browne Headquarters and the Pirbright Institute where “appropriate development and redevelopment opportunities will be supported”. Secondly, other major previously developed sites, including Merrist Wood College, Bisley Camp and RHS Wisley were identified as suitable for “small scale or infill development and redevelopment”.

2.4. The provisions of Draft Local Plan Policy 9 have, however, not been carried through to the Submission version of the Local Plan (July 2016). Instead, there is a new draft Policy 2. Draft Policy 2 gives no recognition to previously developed sites in the green belt such as the Merrist Wood campus, and fails to support the present and future sustainability of rural settlements.

2.5. Although not explained as the reason for removing draft Local Policy 9, we understand that as the NPPF now gives greater support for the limited infilling or the partial or complete redevelopment of previously developed sites, there is perhaps no need to recognise major previously developed sites in the Green Belt in the Local Plan to allow for their expansion.

2.6. Supporting text to draft Policy 2 states that “if major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt”. Seemingly using these criteria, the Submission Local Plan proposes to remove some major developed sites from the Green Belt, including Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford. Further, it is proposed that these sites are then allocated for development, including housing, or designated as Strategic Employment Sites.

2.7. Supporting text states that the Council considers that “exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development” (para. 4.3.16).
2.8. We have reviewed the Guildford Borough Green Belt and Countryside Study, prepared on behalf of the Council by Pegasus Group, to understand the evidence base upon which the Council is relying for green belt matters. This study reviewed all of the previously developed sites within the green belt, to determine whether there are opportunities for appropriate expansion or redevelopment of those sites. Sites were determined to either be inappropriate or appropriate for insetting within the green belt as follows:

<See table attached>

2.9. It appears that four broad criteria were used to make the allocations in the above table. These were the proportion of built development/openness; the total site area; land uses and character; and the presence or otherwise of defensible boundaries. Pegasus Group’s findings can be summarised as follows:

<See table attached>

2.10. Pegasus Group conclude that sites 1-7 should be inset from the green belt and that sites 8-11 should continue to be ‘washed over’ by the green belt.

3. Draft Policy 2

The case for insetting Merrist Wood from the Green Belt

3.1. The college’s contention is that if these criteria are applied properly and consistently then Merrist Wood College should also be inset from the Green Belt.

3.2. Local and national planning policy requires that land which it is unnecessary to keep permanently open, should not be included in the green belt.

3.3. We do not accept the findings of the Green Belt and Countryside Study that concludes that it would be inappropriate to inset Merrist Wood College from the Green Belt. We believe the specified criteria have not been applied consistently and if they had, Merrist Wood would have been proposed to be inset from the Green Belt and treated similarly to other undesignated sites.

% Built Development

3.4. Of the 11 sites examined, seven were identified as being appropriate for insetting in the Green Belt. Merrist Wood has the second highest proportion of built development on site, more than five of the other sites that are proposed to be inset from the Green Belt. This is significant and conveys that the educational campus is packed tightly with development, with minimal areas of open land, particularly when compared with other developed sites in the Green Belt. The council’s study concludes that 6.4ha of built development exists on site. This is five times as much development as exists on the University of Law site.

Total Site Area

3.5. Again, when compared with the seven sites proposed for removal from the Green Belt, only two sites are larger than Merrist Wood in overall area. At 12.7ha in size, Merrist Wood is twice as large as Mount Browne Police HQ, and three times the size as the University of Guildford site. Both these sites have been proposed to be inset from the Green Belt.

3.6. It has been consistently acknowledged by the council that Merrist Wood College is a major previously developed site in the Green Belt and that policy has continued to support the expansion of the college campus.

Uses and Character

3.7. The council’s study states that the campus includes ‘agricultural buildings sparsely arranged within open grounds. Areas of open land contribute to the openness of the wider Green Belt’.

3.8. We strongly disagree with this description. College’s land ownership covers an area of over 400 acres. However, the main educational facilities comprise of two distinct areas, the northern and southern campuses. The northern campus
comprises teaching blocks, canteen and meeting space, student accommodation, sports pavilions, glasshouses, and workshops. There are large areas of car parking and other hard surfacing. The northern campus is situated on a ridge and contained by trees and ancient woodland on all aspects.

3.9. The southern campus accommodates one of the largest indoor equine arenas in the south east, with sprawling areas of hardsurfacing, storage sheds and machinery warehouses. The site is contained to the south by woodland and Holly Lane, a main route into Worplesdon.

3.10. The site is not sparsely arranged within open grounds and the land within the northern or southern campuses does not contribute to the openness of the wider Green Belt. Merrist Wood has the second highest proportion of built development on site, more than five of the other sites that are proposed to be inset from the Green Belt. This is significant and conveys that the educational campus is packed tightly with development, implying minimal areas of open land.

3.11. It is important to note that the boundary proposed for the site when it was designated as a ‘Major Developed Site (MDS) in the Green Belt’ under draft Policy 9 ‘Villages and major previously developed sites’ of the Draft Local Plan (Regulation 18 – July 2014) only included that land covered by the northern and southern campuses. The built facilities of the College are split in two by open fields used as pasture and for sports but this land was never included within the MDS boundary.

**Defensible boundaries**

3.12. The main criticism of the site by the council is that the defensible boundaries of the site are incomplete or absent. Again, we strongly disagree with this conclusion.

3.13. As mentioned above, the northern campus is situated on a ridge and contained by trees and ancient woodland on all aspects. This means that substantial built development on this part of the campus is screened from wider views and therefore contributes little to openness of the Green Belt.

<See picture attached>

3.14. The southern site too benefits from defensible boundaries including the existing trees, hedges, and roads to the south. These combine to create a clear demarcation of the site’s developed areas on the landscape.

<See picture attached>

3.15. In any event, the site’s defensible boundaries could easily be strengthened through a landscaping scheme; either implemented as immediate plans or as part of redevelopment works for the campus, which are in the process of being prepared and have been discussed with the Council through the pre-application process. The college has sufficient land ownership around the site to allow boundary strengthening works to proceed easily.

<See picture attached>

3.16. Even if Merrist Wood Campus is inset from the Green Belt, we would only expect the built facilities of the College to be inset. This would be consistent with the approach taken to the previously proposed MDS boundary. Furthermore, a variety of other development management policies would ensure that any development inappropriate for the site is avoided.

**4. Development aspirations**

4.1. Insetting the Merrist Wood College campus from the Green Belt would also assist the College in realising their development aspirations to modernise and grow the College.

4.2. The Merrist Wood College campus is in need of urgent investment and renewal. It operates from facilities which are no longer fit for purpose by modern teaching standards and it is suffering from a prolonged period of under-investment.
4.3. The outdated accommodation is expensive to maintain. The campus desperately needs to re-invest in order to improve its educational offer and become financially viable and self-sustaining. Without such investment, there is a very real danger that prospective students will venture elsewhere to colleges with considerably better facilities. Although the college is well regarded locally, it is falling behind the top performing land-based colleges at a crucial time when the higher and further education sector is in a state of flux.

4.4. The college wishes to improve its education offer through a series of enhancements to the campus and its facilities. These aspirations have been shared with the Council through their pre-application process and we expect to submit a planning application for this improvements shortly.

5. Proposed amendments

5.1. Our client is concerned that the Submission Local Plan is unsound for the following reasons:

5.2. 1. The plan fails to present the most appropriate strategy for the Borough’s previously developed sites within the green belt, based on the Council’s own evidence, and is therefore not justified.

5.3. 2. Through failing to channel appropriate development to the Borough’s previously developed sites in the green belt on a consistent basis, the plan does not provide for the most sustainable pattern of development over the plan period and is therefore inconsistent with national policy.

5.4. We request an amendment to the supporting text to draft Policy 2 as follows:

Para 4.3.15 The following major previously developed sites are now inset from the Green Belt: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute, the University of Law Guildford and Merrist Wood College.

Examination in Public

5.5. We wish to appear at the forthcoming Examination in Public to present our case on this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 22680001_Draft Policy 2.pdf (408 KB)

Comment ID: PSLPP16/18537  Respondent: 15483521 / Indigo Planning Limited (Tania Tindale)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S2: Housing Need

Requirements of the NPPF

The NPPF was published in March 2012, long before work began on the Local Plan. Therefore the evidence base which supports this Local Plan should be NPPF-compliant.

One of the key aims of the NPPF is to boost significantly the supply of housing. To achieve this aim, the NPPF places new responsibilities on local planning authorities to “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in their housing market area” (Paragraph 47). This evidence base should be “adequate, up to date and relevant” (Paragraph 158). The NPPF also requires that the Plan should identify the scale and mix of housing which:

- Meets household and population projections;
- Addresses the need for all types of housing, including affordable housing; and
- Caters for housing demand and the scale of housing supply to meet this demand.

Requirements of the NPPG

The Planning Practice Guidance to accompany the NPPF was first published in March 2014 and is kept up-to-date on an ongoing basis. It provides further guidance on the steps that plan-makers should take when determining the objectively assessed housing need in their area.

Paragraph 080 requires that housing “needs should be assessed in relation to the relevant functional area, ie housing market area”. This means that authorities should consider the need in those neighbouring authorities with which it has strong economic or migration links, in addition to its own need.

Paragraph 015 goes on to set out that the household projections published by the Department for Communities and Local Government (DCLG) should provide the starting point for estimating the overall housing need.

Paragraph 016 states that wherever possible, local needs assessment should be informed by the latest available information. The NPPF is clear that Local Plans should be kept up-to-date.

Paragraph 018 requires that an adjustment to the starting point should be considered to ensure that sufficient housing is provided to meet the needs of the economy (by increasing the local labour supply). It states: “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area”.

Paragraph 019 goes further, setting out that a further adjustment should be applied if there are market signals indicating an imbalance between the demand for and supply of housing: “prices or rents rising faster than the national/local average may well indicate particular market under supply relative to demand”. Relevant indicators include house prices, rents, affordability and overcrowding.

Compliance with NPPF and NPPG

The Proposed Submission Local Plan (July 2016) (Regulation 19 consultation) sets out that the council will make provision for 13,860 additional new homes (Policy S2) over the plan period (2013-2033). This equates to an annual figure of 693 dwellings per annum. This is made up of 517 homes, with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability (total 693).

This figure of 693 dwellings per annum is taken from the West Surrey Strategic Housing Market Assessment (SHMA) – Guildford Summary Report (October 2015) prepared by GL Hearn (Section 4 - Objectively Assessed Need).

The previous iteration of the Local Plan (draft version - July 2014) (Regulation 18) set out that provision would be made for 13,040 new homes over the plan period (2011-31), equating to an annual requirement of 652 new homes a year. This updated figure therefore represents an increase of 820 homes over the plan period, in comparison to the previous (Regulation 18) version.
This increased annual requirement is consistent with the Fully Objectively Assessed Need (FOAN) set out in the West Surrey SHMA October 2015. However, the OAN identified within the 2015 SHMA was based on 2012 population data therefore cannot be considered to be a sound FOAN which meets the requirements of the NPPF and NPPG, as it is not ‘up-to-date’.

**Calculation of OAN**

The NPPG requires that the starting point for the calculation of OAN is the household projections published by the Department for Communities and Local Government (DCLG) when estimating the overall housing need (Paragraph 015). Household projections are derived from the ONS Sub-National Population Projections.

The 2015 SHMA applies household formation rates from the 2012-based household projections to the 2012-based ONS Sub-National Population Projections to provide an appropriate starting point for considering housing need.

**Population projections**

Since the publication of the mid-2012 population projections in 2013, mid-year population projections have been published for mid-2013, mid-2014 and mid-2015. As a minimum, the mid-2014 projections should have been considered as the basis for the 2015 SHMA which was prepared in 2015 and published in October 2015, well after the mid-2014 projections were published.

Between both 2013 and 2014, and 2014 and 2015, the population of the UK increased by approximately 0.8% overall, year on year. In both time periods, the population growth in the year to mid-2014 and mid-2015 was greatest in southern and eastern England. The mid-year population estimates for Guildford and resulting population increase is summarised in Table 5.1 below:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford</td>
<td>139,710</td>
<td>141,009</td>
<td>142,958</td>
</tr>
<tr>
<td>% change on mid-2012</td>
<td>+1%</td>
<td>+2%</td>
<td>+5%</td>
</tr>
</tbody>
</table>

Table 5.1 – Mid-year population projections (ONS Sub-National Population Projections)

The figures demonstrate that there has been substantially higher population growth in recent years in Guildford. It can therefore be expected that this will have a material effect on the household projection rates which would be applied in the SHMA relating to Guildford and the surrounding Housing Market Area.

**Household Formation Projections**

On 12 July 2016, DCLG published the 2014-household projections, which update the 2012-household projections. The updated figures project average household growth of 210,000 each year across the country between 2014 - 2039. The household projections are derived from the population projections set out above.

In Guildford, the annual household growth has increased from 499 homes per year (2012-based projections) to 538 homes per year (2014-based projections). This is an absolute difference of 39 homes per year. This indicates that, as expected, Guildford Borough Council needs to account for higher household formation rates and increased housing need when calculating their OAN.
Five Year Land Supply

GBC have re-confirmed recently (in the Land at Wisley Airfield decision) that they do not have a five year supply of housing land. This is coupled with the significant and persistent underdelivery in housing over the years, and also the large backlog of housing provision given this persistent under-delivery. This situation all points to GBC planning for more homes and the delivery of them at the earliest opportunity in the Plan Period. It also confirms that GBC should be selecting sites that do not require the delivery of significant infrastructure.

Delivery of Affordable Housing

The overall housing target for the borough should be higher to make a tangible difference to meeting the affordable housing needs of the area.

The SHMA concluded that house prices across the HMA are substantially above the South East level. The evidence clearly indicates strong growth in prices and deterioration in affordability over the initial part of the 2001-11 decade. This appears to have contributed to reducing the ability of younger households to get on the housing market.

The SHMA states that there is a shortfall of circa 13,000 affordable homes in the borough, which alone is the equivalent to 718 homes per annum until 2031. The proposed delivery of 693 dwelling per annum does not deal adequately with even the affordable housing needs of the area, let alone the overall market requirements.

If GBC continue to only plan for the minimum requirements then no inroads will be made to address the severe affordability issues in Guildford.

Summary

We consider that the OAN should be underpinned by the most up-to-date evidence, as required by the NPPG, which includes the 2014-based household formation rates for Guildford, and the latest population projections.

We consider that, on the basis of the above, the SHMA should be revised to take into account the latest mid-year population projections in order to meet the requirements of the NPPF and NPPG.

We anticipate that, if this analysis were undertaken, the objectively assessed housing need for the Borough is likely to be higher. It is therefore likely to be the case that the housing target should be increased and the additional housing need should then be met through additional sites within the emerging Local Plan.

In any event, the Council should be seeking to exceed and not simply meet the minimum growth needs of the Borough given previous poor delivery rates to stand any chance of meeting its Objectively Assessed Housing Need.

The Draft Plan as currently worded is not sound because:

- It is not positively prepared as it fails to adequately meet Guildford’s housing need and does not aspire to exceed minimum requirements and build in flexibility;
- It is not justified as it is not based on a robust spatial strategy to meet housing need; and
- It is not effective as it is unlikely to deliver enough new homes over the Plan period and at the right time.

Policy S2 - The Spatial Vision

The Borough’s spatial strategy is set out within Policy S2 Planning for the borough – our spatial development strategy and the supporting text. Paragraph 4.1.6 states that the Council will focus growth to the most sustainable locations, determined by a spatial hierarchy, which identifies a ‘brownfield first’ approach. Policy S2 sets out that growth will therefore be directed to:

- Guildford town centre;
- Urban areas;
- Inset villages; and
Identified Green Belt villages.

This order of preference has been carried forward from the previous iteration of the Local Plan (July 2014) (paragraph 4.4). This hierarchy reflects the most sustainable options for growth, in line with the NPPF. We do not dispute this approach.

However, paragraph 4.1.8 recognises that these four preferred locations are unable to accommodate all the new development that is needed and that therefore additional development should then be directed to:

- Countryside beyond the Green Belt;
- Urban extensions to Guildford and Ash and Tongham;
- New settlement at the former Wisley airfield; and
- Development around villages (including some expansion).

Given that Guildford is the Borough’s most sustainable settlement it is wholly logical that, in accordance with the overall spatial vision, development should be directed towards urban extensions to Guildford (and Ash and Tongham) ahead of new settlements (ie Wisley airfield) and development around villages (ie Normandy and Flexford village expansion).

In reality, however, the robustness of the spatial strategy has been undermined by two factors; the Council’s over-riding priority to the protection of the Green Belt over the presumption in favour of sustainable development and the exceptions made to include some large strategic sites low down in the hierarchy based on the infrastructure they could provide.

In terms of the Liddington Hall site, whilst this falls fairly high in the hierarchy given its sustainable urban edge location, the site has been removed from the latest Proposed Submission Local Plan (Regulation 19 version) because of its perceived high Green Belt sensitivity scoring. (We look into this matter in more detail in Chapter 8)

Conversely the new strategic site at Normandy and Flaxford, has been allocated for 1100 units despite its lowest ranking in the hierarchy, and its poor green belt sensitivity scoring on the basis that it will provide a new secondary school.

Similarly Wisley, which again falls below Liddington Hall in the hierarchy has been allocated because the scale of development (2100 new homes) will provide other uses that benefit the wider community and because of the infrastructure which can be provided.

The impact of this approach is that growth will not be focused on the most sustainable locations in conflict with the aspirations of the NPPF and policy S2 of the emerging Plan.

The Draft Plan as currently worded is not sound because:

- It is not justified as it is not based on a robust spatial strategy to meet housing need.

**Policy S2 - Proposed Housing Strategy**

As is set out within Section 5 above, the proposed Submission Version of the Local Plan identifies housing sites within the urban area, on the edge of the urban area, and within the Green Belt to meet the housing target of 693 dwellings per annum (13,860 homes across the plan period 2013- 2033).

**Over-reliance on a limited number of strategic sites outside the built up area**

The Council is relying heavily on a limited number of strategic housing sites outside the built up area at Ash and Tongham, Gosden Hill Farm, Blackwell Farm, Wisley Airfield and Normandy and Flexford village expansion to deliver a considerable proportion of its new housing across the Plan period (approximately 8,000 new homes – or almost 60% of the overall target).
Such strategic sites are inherently more complicated and take longer to start delivering new homes. The heavy reliance on such sites (60% of the total target) is likely to create greater pressure on housing delivery in the Borough as the majority of housing will come forward later on in the plan period.

The major sites are set out in Table 7.1 below.

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Delivery period</th>
<th>Draft Site Allocation</th>
<th>Reference</th>
<th>Total number of homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ash and Tongham Strategic location of growth</td>
<td>1,262</td>
<td></td>
<td>Land to the east of White Lane, Ash Green</td>
<td>A28</td>
<td>62</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Land to the south and east of Tongham and Ash</td>
<td>A29</td>
<td>1,200</td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm</td>
<td>3,800</td>
<td>1-15</td>
<td>Gosden Hill Farm, Merrow Lane, Guildford</td>
<td>A25</td>
<td>2,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Blackwell Farm, Hogs Back, Guildford</td>
<td>A26</td>
<td>1,800</td>
</tr>
<tr>
<td>Former Wisley Airfield</td>
<td>2,100</td>
<td>1-15</td>
<td>Land at Former Wisley Airfield, Ockham</td>
<td>A35</td>
<td>2,000</td>
</tr>
<tr>
<td>Normandy and Flexford village expansion</td>
<td>1,100</td>
<td>1-15</td>
<td>Land at Former Wisley Airfield, Ockham</td>
<td>A46</td>
<td>1,100</td>
</tr>
</tbody>
</table>

Table 7.1 – Key strategic sites (draft allocations)

**Policy S2 - Proposed Housing Strategy**

Policy S2 states that the delivery of homes is expected to increase over the plan period reflective of the timescales associated with the infrastructure improvements required to deliver these strategic sites.

Furthermore paragraph 4.1.9 of the supporting text to Policy S2 acknowledges larger development sites, including the strategic development sites, will deliver the majority of new development in years 6-10 and 11-15 of the plan period.

This is consistent with the information contained within the Latest Land Availability Assessment (LAA) (February 2016) which confirms that on these large strategic sites a high proportion of the dwellings will be delivered in the later phases of the Plan period rather than from Year 1. For example, at Wisley airfield only 150 of the 2100 new dwellings are expected to be delivered in the first five years, with 500 expected during the plan period 6-10 and the remaining 1,450 in Years 11-15 (Housing Trajectory, page 20, LAA 2016).

Despite this, within the Site Allocations section of the Plan (page 122) it states:
“Phasing of sites across the plan period is not proposed in the site policies. Allocated sites are encouraged to progress development proposals as soon as possible, to help provide housing in the earlier stages of the plan period, to help boost housing supply. Equally, where allocated sites have been identified as likely to deliver in the later years of the plan period due to constraints, if these are resolved sooner, development proposals are encouraged.”

We consider that it is unrealistic to assume that these strategic sites will be brought forward to boost housing supply in the early phases of the plan period (years 1-5 and 6-10) and have serious concerns over whether they will deliver significant numbers of homes during the Plan period for the reasons set out below.

Deliverability of Strategic Sites outside of the built up area

We set out below a number of factors which will affect the deliverability of these larger strategic sites. In many cases there is serious doubt as to whether they can realistically be delivered until, at the very least, towards the later phases of the Plan period (if at all during the Plan period) because of the significant infrastructure requirements associated with them. The Council should not be allocating such sites without certainty that such constraints can be adequately addressed.

Ash and Tongham Urban Extension

The Council consider that this strategic area of growth is likely to generate 1,241 homes to 2033.

Guildford recognises that extensions to Ash & Tongham are being delivered on a piecemeal basis and therefore housing is being delivered without any wider supporting and infrastructure benefits. Therefore, it may be more difficult to ensure that the appropriate connections can be secured in a comprehensive and structured manner.

It is interesting to note that whilst the June 2016 Topic Paper: Housing Delivery considers that the harm associated with additional growth in this area would significantly and demonstrably outweigh the benefits to the Borough, the two site allocations making up this urban extension are still included in the Submission Version of the Local Plan.

Blackwell Farm

As is set out in Table 7.1 above, Blackwell Farm is allocated for 1,800 homes in the Draft Submission Local Plan. The site would require more than one access point due to the quantum of development. It is proposed that the existing junction between the A31 and Down Place will be upgraded to form one access, which is located on a 50mph stretch of the A31. This access will require construction in an Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV). No detailed design of this upgraded access has been provided, and it is unclear whether it is practical or possible to provide a junction at this location.

Furthermore as this access would provide access to the Surrey Research Park, Surrey Sports Park, University of Surrey and Royal Surrey County Hospital there would a high level of traffic. This could be problematic due to the close proximity of the bridge on the A31. Against this context, there is likely to be a lengthy design, review and implementation process, with involvement from Highways England.

There are no details provided of where a second access would be located.

In terms of sustainable modes of transport, the development is required to contribute to a new Guildford West (Park Barn) railway station which would offer railway connections. However, the deliverability of a new railway station is likely to involve a lengthy process in terms of planning and construction, as well as securing funding.

The site is currently poorly served by bus services, which would require significant investment to be upgraded. The site is proposed to be part of the Sustainable Movement Corridor however this is not likely to be delivered until 2033.

In light of the above, there are significant unknowns over the access to the site, whether Highways England are supportive of the access proposals, and the timing of a new railway station at Park Barn which is the key to securing sustainable access to the site.

Gosden Hill Farm
Gosden Hill Farm is allocated for 2,000 new homes, however, the site is poorly connected to the public transport network and being bound to the A3 to the north, is likely to encourage car-borne trips. The site is not sustainable.

As part of the new development, a new railway station known as Guildford East (Merrow) station and Park & Ride scheme would be delivered. This site is also proposed to be part of the Sustainable Movement Corridor which again, is a long term project (to be delivered by 2033), some of which has not yet been designed. Similarly, there are questions around when the railway station could be delivered.

New bus services would also need to be implemented to support residential development, as existing services are not set up to accommodate this level of additional development, as well as being located around 1km from the site.

Again, there are serious question marks over the sustainability and deliverability of the scheme.

**Wisley airfield**

Wisley Airfield is allocated for approximately 2,000 new homes and a mix of other uses.

The proximity of the site to the trunk road network which is more than likely to encourage car trips.

Planning permission for the redevelopment of Wisley Airfield (including 2,068 new homes) was recently refused by Guildford Borough Council on 8 April 2016. Reason for Refusal 3 stated that the application had not demonstrated that the proposed development would not give rise to severe adverse impact on the safe and efficient operation of the strategic road network (A3/M25), nor that it would not give rise to a severe impact to the efficient operation of the local road network (in particular in Ripley and the junction of Newark Lane/Rose Lane).

Whilst Guildford’s topic paper: Housing Delivery notes that “further work has been undertaken” in relation to the anticipated traffic impact, it is unclear whether suitable mitigation can be achieved and agreed with both Highways England and Surrey County Council.

The scheme had also promised to deliver accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner. A major new access onto the A3 would require significant consultation with Highways England and could prove to be a relatively lengthy process.

The site is remote from major settlements and the public transport network with the closest bus stops currently 1.6 km to the west of the site.

The accessibility of the site needs to be substantially improved in terms of public transport facilities to avoid becoming a car dominated development. Condition 4 of the recent planning permission related to the applicant’s failure to deliver transport sustainability measures to enable sustainable travel choices to be made to minimise the reliance on the private car.

Given that permission has recently been refused on this site on highways impact grounds and sustainability, there is clearly uncertainty over the deliverability and suitability of the site.

**Normandy and Flexford Village expansion**

The site has been allocated for (amongst other things) up to 1,100 homes.

The site is located a significant distance from the main urban centres of Guildford and Aldershot and has a relatively poor provision of local facilities in its vicinity which is likely to encourage car borne trips. It would need to deliver highway improvements as well as a significant bus network and improvements to the off-site cycle network to minimise the reliance on cars, all of which would require significant investment and planning.

The Council is looking to bring forward this site allocation as a deviation from its Spatial Strategy because it will contain a new 7 form secondary school.

It appears that the village expansion has been identified due to its ability to deliver a new school rather than because it is the most suitable and sustainable option available to the council.
Summary

The delivery of these key strategic sites are dependent upon securing major transport or other infrastructure improvements. In many cases this is dependent on the agreement by statutory third parties to deliver such improvements. It brings into question their deliverability within the Plan period, or at least during the early stages of the Plan when houses are most needed in Guildford. The Council should not be allocating such sites when there is still uncertainty as to whether feasible design solutions can be achieved, particularly when more sustainable options are available such as Liddington Hall.

Deliverability of Liddington Hall

Land at Liddington Hall lies within a sustainable location compared to the strategic sites referred to above with scope to deliver meaningful transport improvements. It lies on the edge of Guildford (which is the Borough’s most sustainable urban area) and within easy reach of the Fairlands Estate. It is well-served by local bus routes with good cycling connections to the town centre.

There is sufficient highway capacity to accommodate development and appropriate and suitable accesses into the site can be achieved. It is not dependent on significant off-site infrastructure improvements in the same way as many of the strategic sites.

The site is in single ownership and is available for development within years 1-5 of the Plan Period without insurmountable obstacles to delivery.

The site has been promoted through the Local Plan process over a number of years, and has previously been identified as being suitable for housing within previous iterations of the Land Availability Assessment (LAA) subject to release from the Green Belt;

Not only would the funds raised by the disposal of the land be entirely re-invested to provide improvements of Guildford College (a significant benefit in its own right), the redevelopment of the site would help plug the gap in housing delivery in the earlier phases of the Plan period.

It is essential for the Council to increase the delivery of housing now (years 1 – 5) through the release of sites like Liddington Hall to counteract the persistent under-supply of homes in previous years, which has led to an unprecedented demand within the Borough and indeed across the South East. The reliance on housing being delivered on strategic sites later on in the plan period should be resisted to avoid compounding this position.

The Council cannot demonstrate a five year supply of housing and the allocation of additional housing through the local plan process would go some way to remedy this, particularly sites like Liddington Hall which are likely to be able to deliver a significant number of new homes, (approximately 600 homes) in the first five years of the plan period.

Over-reliance on Windfall Sites

Table 2 of Policy S2 (Planned Delivery of new homes between 2018 and 2033) confirms that the Council is relying on the delivery of 625 homes through windfall sites over the 15 year period. The LAA (2016) sets out that this equates to 50 units per year in years 6-10 and 11-15 (500 over a 10 year period), plus 125 in the first five years. This is reduced to avoid double counting.

The NPPF requires that a windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence (Paragraph 48). Within the LAA, the Council set out that over the last 10 year period (2006 – 2016), 809 homes have been granted planning permission on sites delivering less than 5 units (in accordance with NPPG). 256 homes were making use of residential gardens, which must be discounted. This leaves 553 homes, which equates to approximately 55 units per year, although this has peaked and troughed over the last 10 year period.

The LAA goes on to state that, as the Local Plan has not been updated since 2003, the majority of housing completions have been from windfall sites, but that this is not expected to continue. It therefore seems overly optimistic to
suggest a similar rate of windfalls in Years 6-10 and 11-15, particularly given that this is when the key strategic sites are expected to come forward.

The heavy reliance on windfall sites to make up the housing targets will also result in lower levels of family housing being delivered, as these sites typically deliver smaller, flatter units, (ie through office to residential conversions) often without any provision of affordable housing.

The Council needs to consider releasing greenfield sites like Liddington Hall to deliver both the quantum of housing needed within the next five years and also the type/mix of housing most needed, including affordable housing to deal with the current acute housing need.

**Policy S2 - Evidence Base**

**Green Belt Review**

**Policy Background**

Paragraph 83 of the NPPF allows for Green Belt boundaries to be altered though the Local Plan process in exceptional circumstance (which should include the inability to accommodate its objectively assessed housing need (OAN) within existing urban areas).

When reviewing Green Belt boundaries, paragraph 84 of the NPPF advises Local Planning Authorities to take account of the need to promote sustainable patterns of development.

Paragraph 85 of the NPPF sets out a number of criteria that Local Planning Authorities should have regard to when defining boundaries. These include (of relevance):

- Ensuring consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not including land which it is unnecessary to keep permanently open;
- Being satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Defining boundaries clearly using physical features that are readily recognisable and likely to be permanent.

**Guildford’s Core Evidence Base**

The Guildford Green Belt and Countryside study (including addendums) forms the Council’s primary evidence base underpinning the selection of potential Green Belt site allocations as part of its Green Belt review to accommodate the required growth within the Borough as set out in policy S2 (Spatial Strategy) of the submission version of the Local Plan.

The study assesses land parcels against their contribution to each of the following four purposes of the Green Belt set out in paragraph 80 of the NPPF by a simple a scoring system (1 denoting low Green Belt sensitivity whilst 3 / 4 denoting high Green Belt sensitivity):

- to check the unrestricted sprawl of large built up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment; and
- to preserve the setting and special character of historic towns.

The Housing Delivery Topic Paper that supports the Proposed Submission Local Plan states, at paragraph 4.91, that any land parcels that fall within a red (high sensitivity) land parcel should be excluded.

In terms of the Liddington Hall site, Volume II (February 2013) identified the site to contribute notably to the purposes of the Green Belt (sensitivity score of 3). The site has therefore been discounted from the Proposed Submission Local Plan (Regulation 19 version).
Robustness of Evidence Base

On behalf of the Guildford College Group, LDA Design have prepared a detailed report which challenges the robustness of the methodology and conclusions presented in Guildford Borough Council’s Green Belt and Countryside Study (including addendums).

A full copy of this report is included in Appendix 3 but the key findings are summarised below.

Over-reliance on Green Belt sensitivity scoring in Green Belt site selection

In the absence of any definitive best practice guidance from Central Government on the Green Belt review process, LDA acknowledge that the approach taken by the Council is consistent with Green Belt reviews undertaken by other Green Belt authorities. This includes a four stage process comprising the identification and definition of land parcels, an assessment of the contribution each land parcel makes to the four Green Belt purposes, the sustainability credential of land parcels and an assessment of the environmental capacity of the land parcels to accommodate appropriate development.

The main criticism is that where a land parcel has been assessed as having a high Green Belt sensitivity (in the case of Liddington Hall where it scores 3 out of 4) then the site has been removed as a potential site allocation, whatever the site environmental and or sustainability scoring might be or where it might fall in the Council’s spatial hierarchy. It is clear from the officer’s report to the Extraordinary Meeting of the Council on 24 May 2014 that the greater emphasis on the need to protect the Green Belt has been an over-reaction to public comments during the Regulation 18 consultation and this has to be rebalanced.

Furthermore, LDA has pointed out that some locations that fulfil more or the same number of purposes as other areas (and therefore meet the Green Belt ‘test’), may have capacity to accommodate development without undue harm being caused to Green Belt as compared to other apparently similar, less or more sensitive areas. This may be as a result of fewer ‘absolute’ constraints to development allowing for mitigation measures to be adopted as part of a well-considered masterplan. Conversely areas of Green Belt might only fulfil a single purpose and yet have no capacity to accommodate development, without undermining the very purpose of the Green Belt itself.

Lack of comprehensive and transparent evidence base

LDA consider that the scoring system adopted by the Council is overly simplistic leading to a binary outcome for each Green Belt purpose.

Furthermore there is no supporting information which explains or qualifies how the conclusions have been reached.

LDA advise that a more rigorous and qualitative approach is needed for each land parcel to assess the degree to which the land parcel contributes to each of the Green Belt purposes.

Incorrect Green Belt Scoring for land at Liddington Hall

Even using this simple methodology adopted by the Council, the Green Belt and Countryside Study has incorrectly scored Liddington Hall (land parcel J1) in respect of two of the purposes of the Green Belt, namely the prevention of Guildford and Fairlands from merging and the restriction of urban sprawl.

To demonstrate this LDA has undertaken an independent assessment of the site and its immediate hinterland, which has been informed by a number of site visits and a review of relevant background material, including the Guildford Local Character Assessment and Guidance. Their findings are set out in Section 4 of their report.

LDA conclude that the Liddington Hall site has a very limited role in preventing the merging of Guildford and Fairlands. The separation of developed areas is to a large degree upheld by the mature and substantial vegetation framework which adjoins the site and which is considered to have ‘permanence’ by virtue of its intrinsic landscape, biodiversity and amenity value. Removal of the site from the Green Belt would not compromise the integrity and screening function of retained vegetation despite a narrowing of the physical gap between settlements.

This judgement is supported by recommendations made in the GBCS Volume II Addendum (April 2014).
“The parcel (Liddington Hall) was highlighted as being potentially sensitive in terms of coalescence with Fairlands to the west. However, a strong area of woodland would be maintained between any development within the western part of the parcel and the eastern edge of Fairland, meaning the visual connectivity between the two settlements could be limited appropriately.”

There are no reasons to explain why these recommendations were not incorporated into the subsequent draft of the Proposed Submission Local Plan and the Liddington Hall scoring remained unchanged.

LDA also conclude that the Liddington Hall site has only a limited role in containing the sprawl of urban areas. The encroachment of residential properties and, to a lesser extent, industrial facilities along its boundaries following the designation of the Green Belt establishes a development context beyond the core area of Guildford.

It is judged that a new permanent and definable boundary could be established along Gravetts Lane and the A323 which would be more effective in the long term in preventing further creep of development into the more sensitive rural landscape to the west. If Liddington Hall’s Green Belt sensitivity score is updated to properly reflect the LDA conclusions, then its sensitivity score can be reduced to 2 (medium sensitivity).

The Council acknowledge that because Guildford town is their most sustainable settlement and urban extensions (including land at Liddington Hall) fall fairly high in their Spatial Hierarchy, there are good reasons to explore both low sensitivity and medium sensitivity Guildford urban extension land parcels.

Therefore, the Council should re-consider land at Liddington Hall alongside the other Guildford urban extension sites (Blackwell Farm, Gosden Hill farm and Keens lane) having regard to its sustainability or environmental capacity and certainly ahead of allocations such as Wisley and Normandy and Flexford (which are lower down the settlement hierarchy and are in less sustainable locations).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 22680003_Land_at_Liddington_Hall_Part3.pdf (8.8 MB)
- 22680003_Land_at_Liddington_Hall_Part2.pdf (9.4 MB)
- 22680003_Land_at_Liddington_Hall_Part1.pdf (1.1 MB)
- 22680003_Land_at_Liddington_Hall_Part4.pdf (8.0 MB)
**I object to development in areas at risk of flooding (Policy P4) The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.**

**I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.**

**I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.**

**I object to the proposed Infrastructure Schedule (Appendix C) There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.**

**I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5) The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.**

**I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
**I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.**

**I object to the lack of proper infrastructure planning for sites (Policy I1) The current and existing services are overstretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
** I object to poor air quality concerns (Policy 13) The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12) Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place. Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1) The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9584  Respondent: 15483553 / Robert Bastable  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the Borough Wide Strategy (Policy S2) There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/4406  Respondent: 15483585 / Patricia Fewson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed Submission Local Plan.

Of most concern is the significant impact of more traffic on already busy narrow local roads. The roads in the Horsleys area are basically narrow, winding country lanes, already busy at peak times and will not be able to cope with the additional high volumes of traffic the developments would create, especially the major one at Wisley airfield. Additional major concerns include moving the boundaries of the Green Belt, lack of sustainability of the developments and inadequate proposed improvements to local infrastructure especially medical facilities and schools. The proposed developments are out of character with the village nature of the Horsleys and, particularly, the density of the new housing will contrast starkly with the existing settlements.

LAND AT FORMER WISLEY AIRFIELD
I wish to object specifically to the above proposed development. It breaches Green Belt rules, will have major adverse impacts on the natural environment including wildlife, local traffic and infrastructure as well as resulting in a development which is total out of character with surrounding settlements and lacking in the fundamental tenets of sustainability. The housing density of the proposed new development would be roughly 6 times as dense as the existing local settlements.

My major concern is the lack of suitable additional travel infrastructure in the proposed development will make the car the first choice of transport – probably another 4000+ cars and associated journeys - adding to the already serious traffic queues experienced around the M25/M3 junction, already of concern to Highways England. Effingham Junction and East Horsley rail stations do not have sufficient parking to accommodate the extra cars and vehicles are already now parking on Effingham Common Road as the station car park is regularly full.

The site falls within the Metropolitan Green Belt and, as such, should only be developed if the proposal meets “very special circumstances”. The proposal singularly fails to demonstrate that the benefits of the development outweigh the harm to the Green Belt and other aspects noted above. The development would create the largest settlement in Guildford Borough after Guildford itself, and be the inevitable precursor to further development of the Green Belt and spread of suburban London outside of the M25.

Both Ockham & Wisley Commons lie within an area designated as a Site of Special Scientific Importance (‘SSSI’) and forms one part of the Thames Basin Heaths Special Protection Area. A large percentage of the site lies within the 400m Exclusion Zone where new building is effectively prohibited. The impact of such a large settlement and associated pets will inevitably have a detrimental impact on the local wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4407  **Respondent:** 15483617 / S Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt. Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.
I object to the Local Plan as the development proposed is not sustainable

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

I object to not protecting the Green Belt

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

I object to the damage to the historic environment as a result of the scale of the proposed development

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

I object to poor air quality concerns

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the lack of proper infrastructure planning for sites

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2299  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation. Also it's clear that affordable houses in this area are still too expensive for those with jobs in the state sector so this is really building more executive homes for London commuters. Preserve our green belt, please don't build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4410  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable. Also the village of West Clandon cannot sustain any more traffic through it as a short cut to Guildford. There has already been one instance of a child being knocked down by a car on The Street which is a residential road and the speed limit is not imposed here. Also the narrowness of the road in places makes it unsuitable and dangerous (pavement is not safe) with an increased flow in traffic.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic</td>
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<th>Respondent: 15483713 / Claire Walker</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9608  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9606  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to development in areas at risk of flooding (Policy S1)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4471  Respondent: 15483713 / Claire Walker Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4472  Respondent: 15483713 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am fully supportive of the responses submitted by the Guildford Residents Association (GRA) about this Submission Local Plan.

I wish to emphasise my concern about:

1. the lack of suitable infrastructure for the massive increase in housing proposed.
2. the proposal to use green belt land for so much of the housing when brownfield possibilities have not been fully explored and used first.

I believe that the Objectively Assessed Need figure of 693 homes per annum for future housing is excessive and based on flawed calculations within the SHMA.

The OAN should also take account of constraints inherent in Guildford Borough, such as:
• the lack of infrastructure (particularly transport infrastructure) affecting road travel and causing serious congestion, within the Borough
• the risk of flooding in a large number of key areas of the Borough
• the large amount of Green Belt land within Guildford Borough, which limits the amount of available land for development (see below)
• the fact that Guildford is both an historic town and a “gap town”, both of which reduce its ability to easily correct the infrastructure deficiencies
• Protected wildlife areas
• Landscape areas

I strongly oppose the submission local plan as it currently stands, and hope that changes will be made to address my concerns and the more detailed concerns as in the GRA response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/581  Respondent: 15483745 / Penelope Southcott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The flawed evidence base for numbers of houses needed:

1. the massive number of new houses proposed, based on a flawed OAN of 12,426, and on only 60% of university students being provided with accommodation on campus.
2. the overestimate of the likely population growth due to failure to consider the large number of student temporary residents in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2302  Respondent: 15483777 / Peter Firmo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The amount of proposed development that Guildford Borough Council has prescribed for our villages is totally unsustainable. The level of development proposed is unreasonable and would change the whole character and ambience of the villages. I object to this most strongly. The proposed increases to Ripley, Send and Send Marsh and Burnt Common are both disproportionate and unsustainable with the existing level of infrastructure. Send village is to expect 22% increase in housing and Send Marsh/Burnt Common a 27% increase, whereas the Borough as a whole will be approximately 14% with this housing requirement. Our villages SIMPLY CANNOT COPE with such a huge increase in population.

The proposed insetting of land planned in and around Ripley, Send and Send Marsh and Burnt Common would both virtually double the size of the villages and increase the potential for future land speculation and proposals for inappropriate development. The current road structure is already stretched to capacity and the lack of shops and school place provision would be exacerbated further by the draft Local Plan proposals.

The communities are semi-rural villages and very poorly served by public transport. The buses to Send are approximately one an hour Monday to Saturday, finishing at about 6.45pm and none at all on Sundays. Burnt Common has an additional service the 515 which passes along Portsmouth Road on the way to and from Kingston. No public services go to the Villages Medical Centre in Send Barns Lane at all. This medical centre serves a wide area including Send, Send Marsh, Burnt Common, Ripley, Old Woking and beyond. The service is extremely busy currently, so increasing the amount of residents so vastly will cause great problems in increasing numbers of service users. The absence of buses passing the medical centre, results in patients using cars to travel there or getting lifts from friends or voluntary services. I object to your greed putting our lives at risk.

The communities of Ripley Send Marsh and Burnt Common have few proper shops at all apart from the Burnt Common petrol station store. There is no open space where children may kick a ball around and no community centre. In fact we feel that the scoring system your Council has used for sustainability is seriously flawed and will have affected our ranking in some areas.

The access roads around this proposed development site are appalling with traffic exiting from the A3 northbound carriageway still travelling at high speed in London Road. It is mooted that there might be a northbound access to the A3 at Burnt Common but this has been talked about for at least 25 years to my knowledge. The noise and pollution from the A3 abutting this site is dreadful. The roads nearby flood frequently, both from the run off from the fields and the A3. The road at the foot of the slipway from the northbound A3, at its junction with Vicarage Lane floods frequently throughout the year and is often flooded for several days at a time in the winter. The site lines for exiting the properties in question which back onto the northbound carriage of the B2216 are appalling. You are entering a road where the traffic is travelling at 60mph, with very restricted views. The whole roadway system in this area would need redefining if development went ahead here. Much of the proposed land for development is floodplain, building on this again will increase the likelihood of flooding to both roads and housing which is completely unacceptable. I object to this in the most strongest terms.

In summary I consider that the housing requirement for the borough as a whole has been significantly overstated and that Ripley, Send, Send Marsh and Burnt Common have both been unfairly and inappropriately targeted to bear a disproportionate number of additional dwellings. I object to this most strongly.

Our local MPs Sir Paul Beresford and Anne Milton have stated that they question the housing numbers in the Local Plan. They understand that even though the ONS has revised the population growth figures downwards this has not been reflected in the total number in the Draft Plan. Likewise the decision to leave the EU and have a more direct control on our borders must also call for a re-evaluation in the population growth figures. It is also Sir Paul Beresford’s contention that the Green Belt must be protected and that removal of any site from the Green Belt must be under exceptional circumstances. I share this opinion that the housing requirement in the Draft Local Plan has been overstated and that Guildford Borough Council has not had sufficient regard to their duty to protect the Green Belt land in the borough.

The road network is quite inadequate for the level of the existing population at peak times and it would be totally unable to cope with the proposals for increases in the population of Ripley, Send, Send Marsh/Burnt Common.

I object to these developments, I also consider that the scale of the proposed development will destroy the essentially rural nature of the parish and that the general lack of infrastructure within the villages makes them unsuitable for anything other than minor infill housing development. I request that these comments are shown to relevant planning director and I should be grateful if you would please acknowledge receipt of my email.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/2303  **Respondent:** 15483809 / Garret & Sinead Tynan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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Objections to Guildford Borough Council Proposed Local Plan (June 2016).

We wish to register our objection to the draft Local Plan. More specifically, we wish to object to the removal of East and West Horsley from the Greenbelt and to the proposed developments in these villages and the surrounding areas for reasons outlined further below.

The Local Plan fails to take due consideration of the detrimental impact such extensive development will have on transport, local roads and road safety. The proposals will have a materially negative impact on the quality of life for existing residents. We specifically object to:

(i) Traffic and parking: Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of East and West Horsley. For example, parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village halls will all be affected.

(ii) The significant increase in traffic will cause severe congestion on the local narrow rural roads (which are already busy). This will be exacerbated by wide vehicles including increased bus and HGV movements.

(iii) The increased traffic will pose a danger to local cyclists and pedestrians given that there is an absence of cycling paths and lack of pedestrian footpaths (and no space to provide them).

(iv) The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

(v) The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in the Borough.

(vi) Local Road Network: In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guilleshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that "consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed". It appears that the Plan is proposing a strategic site at Wisley Airfield without having given due consideration to the improvements which will be needed to the local road infrastructure. If that is the case for Wisley Airfield, then it is almost certainly true for the proposed developments in East and West Horsley as well.
We object on the grounds that local primary and secondary schools are already at capacity with no immediate plans for expansion. No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield are not planned until many years into the project. We object on the grounds that the East Horsley Medical Practice is already operating at (or close to) capacity and there are no provisions in the plan for addressing this.

Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. Furthermore, the existing drainage system cannot cope, evidenced by the river which materialises on Ockham Road North following heavy rain.

We object to the removal of East and West Horsley from the Greenbelt. Taken together with other sites such as the former Wisley Airfield (also known as Three Farm Meadows), Greenbelt status serves a vital role in protecting against urban sprawl from London. Under the National Planning Policy Framework, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

We object to the disproportionate allocation of housing in this particular part of the borough. More than 23% of the Plan's new housing is proposed for the immediate localities of Ockham, Ripley, Send and the Horsleys.

We object to the fact that insufficient consideration has been given to the environmental and ecological value of the former Wisley Airfield site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI). Serious concerns about this site have been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

We object to the continued inclusion of the former Wisley Airfield/Three Farm Meadows site - where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

We would also note that the projections for economic and population growth were formed before the "Brexit" referendum result was known. Given the potential impact the result is expected to have on the economy and population growth (including migration), we object to developments which fundamentally alter the nature of the local area while relying on outdated projections which possibly now need to be significantly revised downwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2305  Respondent: 15483841 / Tony Questa  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to register my objection in the strongest possible terms to the plan to remove Chilworth and Shalford from the green belt.

I have just in the last few days become aware of a deadline – which I understand is midnight tonight, please correct me if I’m wrong - to respond to this plan and so have had little time to understand this aspect of the plan and research and organise appropriately. I do no recollect receiving any correspondence from GBC to inform me of this deadline. Neighbours have also made similar comments about correspondence.

I have lived in Chilworth for 18 years. I moved here because of the particular nature of the area: it has a particular semi-rural feeling and a strong community spirit. Any building of mass-produced housing would completely change the nature of the area.

Chilworth for example has two well-regarded schools which have no scope for increased intake. The inevitable result of which would be a reduction in their hard-earned and deserved reputations.

This is in a community that has a trunk-route – the A248 – running through it that is obviously used as the main road link from the Blackwater valley dual-carriageway to the A25.

However the road network itself is completely inadequate for the population that is already here and for the traffic that already passes through it. During peak traffic periods there is considerable congestion and very lengthy delays along the A248 and the B2128 which feeds in turn to the congestion along the A281 into Guildford. Travelling at peak times to work is very difficult and must contribute significantly for example to decreased working productivity and to CO2 and toxic nitrogen-compound emissions in the area. Both schools are on the A284.

In addition the quality of the roads themselves are disgracefully inadequate due to years of neglect.

The idea of adding to these substantial existing problems with further population increase is unthinkable.

Finally for now this plan is strongly opposed by the overwhelming majority of residents in Chilworth and Shalford and in a democratic and representative society we have a right to expect elected representatives to support our views – I assume therefore GBC will do so. Perhaps this is why there was no need to inform residents of the referenced deadline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4417</th>
<th>Respondent: 15483873 / Bridgette Shepstone</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I would like to state my support of this policy of retaining the land for Allotment use.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<tr>
<td>Comment ID: PSLPP16/9616</td>
<td>Respondent: 15483937 / Corrine Stevens</td>
<td>Agent:</td>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

I AM WRITING TO FORMALLY OBJECT TO REMOVING CHILWORTH FROM THE GREEN BELT.  

It is possible for appropriate new development to take place in Chilworth without removing it from the green belt - removing the green belt is not a good way forward nor necessary.  

Please make sure my objection is noted and registered - DO NOT REMOVE GREEN BELT PROTECTION FROM CHILWORTH.  

Thank you.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2307</th>
<th>Respondent: 15483969 / Jane Barter</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

With regards to Insetting of the Green Belt behind Heath Drive and Send Road and in the vicinity of St Bedes Junior School Send Hill – I would register my [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] objections as follows  

- The number of homes (693 pa) that the plan intends to deliver  
- The enclosure of protected Green Belt land within the proposed new village boundaries (for which there will be a presumption for development in the future)  
- The Garlick’s Arch (Policy A43) proposal to build 400 houses and 7,000 sq metres of light/general industrial/storage distribution space on the Green Belt  
- The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon road (Policy A43A) at Burnt Common  
- The wholesale destruction of the Green Belt in this area (including the planned development of 2000 homes at Gosden Hill Farm, Merrow – Policy A25) in clear contravention of the central government’s stated commitment for Green Belt protection.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

**Attached documents:**
<table>
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<tr>
<th>Comment ID: PSLPA16/2308</th>
<th>Respondent: 15484001 / Theo Trayhurn</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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My family and I live in West Horsley [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. My wife) and I would like to object in the strongest terms to what seems a particularly poorly considered local plan in the context of East and West Horsley (the "Horsleys"). There are many potential heads of objection but the following strike me as particularly pertinent:

- From a legal prospective, the local plan does not demonstrate the "exceptional circumstances" that would be required to remove the Horsleys from the Greenbelt.

- The proposals outlined in the local plan would increase West Horsley's housing stock by 35% over a very short period of time. This is a ridiculous position in any event for a village such as West Horsley but an increase in population density of this magnitude would clearly require significant infrastructure development (given the current pressure on education, traffic, drainage and other infrastructure). The local plan does not address this issue. The fact that the local plan has proposed such a fundamental increase to West Horsley's housing stock without addressing this issue raises serious questions as to the core integrity and competence of the local plan.

We expect much better from our elected council and the local plan will be subject to significant challenge if pushed through in anything resembling its current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2310</th>
<th>Respondent: 15484033 / Caroline Ali</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)**

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**I object to the lack of proper infrastructure planning for sites (Policy I1)**

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/9630  Respondent: 15484033 / Caroline Ali  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9628  Respondent: 15484033 / Caroline Ali  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9621  Respondent: 15484033 / Caroline Ali  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/9620</th>
<th>Respondent: 15484033 / Caroline Ali</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** Attached documents:

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<th>Comment ID: PSLPP16/9625</th>
<th>Respondent: 15484033 / Caroline Ali</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4423  Respondent: 15484065 / Ray & Carol Chong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of Normandy we would like to register our OBJECTION to the development of the Normandy & Flexford strategic site for the following reasons:

1. This land is greenbelt and maintaining this is vital to the rural area in which it sits. Normandy is on the slopes of the Hogs Back and views from the Surrey Hills would be drastically affected by the A46 development and would add to further urban sprawl in the area.
2. Normandy is also an area very much used by others outside of it because of its rural location and unique habitats. It provides vital green space for walkers, dog walkers, cyclists, naturists etc. thereby enhancing the quality of lives for others. A46 would create more noise and light pollution in the area thereby reducing the quality of life for all.
3. Wildlife habitats need protecting. We have noticed the decrease in bird populations these last 20 years and the change in species now coming to our garden. The dawn chorus is already greatly reduced here. Hedgehog numbers have also decreased. So even with no new developments, there are already pressures affecting the wildlife to this area.
4. Lack of suitable major roads to take the added traffic. The two roads which bound this proposed A46 site are C and D roads, narrow and unable to take the further number of cars which will be generated by the proposed development. The Guildford Road to which it is linked already suffers from much congestion at peak hours and it is not sustainable to add to the traffic.
5. The unsuitability of the two railway bridges on Westwood Lane and Glaziers Lane. Both of these are narrow and angled in such a way as to make their use always to be approached with care. Westwood Lane is only a single carriageway. Adding to traffic flows on both these bridges are more likely to cause more accidents unless both can be rebuilt and the roads widened.
6. High water table. Our home is situated off of Flexford Road, which is on the slopes of the Hogs Back, built twenty years ago. This new four house development was supposedly very well served with large drains and a private pumping system to deal with the large amount of water run-off from the Hogs Back. However, our garden is always flooded after a downpour, despite the fact that we have three very large trees on and bordering the property and two drains belfow our lawn. Even a meter from the drain, the garden remains saturated due to the clay subsoil and the high water table.

The proposed A46 site similarly is flooded in winter. The homes surrounding the A46 site on Glaziers Lane have for many years had backflow problems with their sewage despite attempts by the Water Authorities to solve this problem. We fear
concreting over such a large area, despite putting in good drainage, would only add to the frequent flood woes in this part of Normandy.

There is also a stream in the middle of the proposed site adding to the drainage issues.

1. Stress on local health services. We realise we have the luxury of Normandy GP Practice, but this facility is already overstretched with its present patient numbers. We frequently have a three week waiting list to see a Doctor in Fairlands or in Normandy. Would there be extra provision to cope with an increased population as proposed?

2. Little need for a secondary school in this area. We understand some Guildford schools are already 63% undersubscribed and a lower birthrate is expected. Also a private site at Rokers is being proposed for the needs of schooling in the west of Guildford. This site is better served with adequate A road access then at he proposed A46 site.

3. In Guildford, there are brown field sites, level carparks, empty office blocks etc that are available for development into housing. We are happy for Normandy to expand with its fair share of 30 – 40 homes being sensitively built. It is the doubling of its population that this proposed development would bring along with the stress on its services that we object to.

These are our objections and would be grateful if these would be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2311  Respondent: 15484097 / Chris Preece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to Guildford Borough Council’s Draft Local Plan dated June 2016. I am concerned on many levels that the plan is unsound and that it is based on flawed data.

Housing numbers:

Regarding housing numbers the Strategic Housing Market Assessment has given a housing need of 693 per year, this is far too high and is double the figure given just 4 years ago.

Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.

The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.

By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.

All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number. Why have Guildford not constrained the figure?
The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4425  Respondent: 15484097 / Chris Preece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill Farm:

This massive proposed development will have a huge impact on Burpham, the proposal is to effectively double the size of Burpham. This is a major assault on a village area on the outskirts of town. Burpham is already congested particularly at peak times, adding to this 2000 houses, a 1000 car park and ride, 2 schools and perhaps a station will add thousands more car movements to an already congested road network. The increase in solution is unacceptable.

Gosden Hill is in the Green Belt, the topography of the hill means it is a very visible site when driving on the A3. Development of these green fields will spread the urban sprawl in a very visible manor significantly up the A3.

A large portion of the traffic from this massive site will head towards Guildford via the roads through Burpham, this is already congested and will simply not cope with the increase, moreover the pollution of near stationary cars will blight the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9631  Respondent: 15484097 / Chris Preece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport:

The evidence on future traffic conditions which has been provided in the Strategic Highway Assessment Report was produced late and is incomplete. Critical information on congestion has not been given in time to be taken into account in the plan proposals.

The proposed Sustainable Movement Corridor is simple unsound and cannot be delivered due to the narrow roads and pinch points on an already very congested route through Burpham.

Of further note is that the proposed Gosden Hill development of 2000 houses plus offices, school etc will add significant pressure to the already congested London road and New Inn Lane. The increase in solution and noise is unacceptable.

The phasing of the proposed Gosden Hill development is in advance of proposed improvements to the A3. This makes no sense.

The major transport issues around Guildford need to be resolved before any further development is considered, these include the proposed A3 tunnel, new river crossing, a workable central bus terminal and a rail station at Merrow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9632  Respondent: 15484097 / Chris Preece  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt:

The National policy is clear in that it attaches great importance to the nature of the Green Belt.

The Plan does not show evidence of exceptional circumstances to justify why the Green Belt land should be used for strategic development.

Brownfield land needs more consideration, surely the decline in the need for retail space means that houses could be built in the town centre instead of more retail units, student accommodation should be constructed on campus even if higher rise accommodation is used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2312  Respondent: 15484129 / Annette Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Page 2244 of 2543
I am writing to raise my concerns about the proposed development in Normandy.

Firstly, I would like to say that I am not objecting to the development per se. My family and I live directly adjoining the land in question and can see that there would be benefits to some development in the area, in particular more local amenities such as a convenience store, pub and post office facility. A reasonable number of new houses would not be objectionable to a lot of people within the village but 1,100 plus schools, nursing homes, retail units, travelling show people pitches, etc risks overwhelming the established community.

I am sure that you will receive many more detailed and more eloquently written objections regarding the inadequate infrastructure in terms of flood risks (of which we already suffer), traffic congestion, pressures on local GP services and the detrimental effect on wildlife, all of which are valid concerns and I am sure you will consider very carefully.

As a family we have young children and are aware of the difficulty of getting into a 'good' school in Guildford. We initially did believe that there was a need for another secondary school in the area, knowing many families who have not been able to get their first choice and have subsequently been offered schools a good distance away. However, we have now learnt through our excellent County Councillor; Keith Witham, that 3 of our local secondary schools - Ash Manor, Kings College and The Connaught school, are actually significantly undersubscribed. Surely it would be better to invest in bringing these schools up to a decent standard so that local people would choose to send their children there, rather than building another large school that appears to be unnecessary? Kings, in particular, would be just as accessible from the proposed Blackwell Farm development as Normandy.

I am concerned that the layout of the development will not encourage new residents to integrate into the established village society that many have worked hard to build up. The village has raised funds and campaigned hard over the years to build the village hall, to get fitness equipment and children's play areas put into the local parks. Residents in the new estate will have no need to leave their enclave, not even to send their children to the already established primary school (what will happen to Wyke school if the plans for the primary and secondary schools are approved?).

I was also rather concerned to note that the area next to our property, which is a known flood zone, now appears to have increased in size. Previously the flood risk area was located alongside the stream or drainage ditch at the far side of the field. It is now shown as encroaching onto our property due to re-landscaping of the area. This would obviously have significant implications for us in terms of insurance and re-sale, not to mention increasing the problems that we already face with overflowing drains from the main road and the back-flow onto our property.

I would like to think that, as an organisation who work on behalf of the local population, you will listen very carefully to the issues raised during this consultation period.

Best wishes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
To whom it may concern,

As a resident of West Horsley I would like to strongly object to the proposed plan to build additional houses on the green belt in and around Horley.

The character of the village would be total changed and we have too few green areas near London as it is and no more should be lost to housing when there are other options available.

Kind regards,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
economy, support the local councils, help build communities, to create a larger conurbation of homes will lead to a sense of anonymity, which in turn can lead to a sense of disengagement and the general breakdown of the local communities. There are other larger more suitable areas that could be developed rather than destroying the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/9662  
**Respondent:** 15485121 / Tracey Mansell  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to these areas being inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.

There are many brownfield sites and areas which remain open for development which could provide much needed affordable housing for the current population. There are also areas which could provide more housing with a little thought around redesign and redevelopment. This would not mean an influx of more people but affordable housing for the existing population. I believe that the plan is for profit and does not provide for the needs of the current residents of Guildford. Where does the DRAFT Local Plan identify the type, size and potential value of these developments? Where does the Draft Local Plan define affordable, with examples of who would be able to afford to live in these houses. Anybody under 35 looking for a property from 1st April 2016 is now being confined to house sharing and room renting. Where does the plan identify this problem?

Why take swathes of the Green Belt countryside that make this area so beautiful and cover it in concrete, just to line the pockets of the house builders. Once it is gone, there is no going back. I am disappointed in the Draft Local Plan and object most strongly. This is nothing more than the road to a dormitory Guildford Borough, property rich and socially and environmentally poor.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/9661  
**Respondent:** 15485121 / Tracey Mansell  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
My main objections to the Guildford Local Plan are as follows;

During the previous consultation there was much publicity, documentation, booklets and CD’s available for people to look at and to read. There was also much interest in the Local Plan. That was seen as a done deal with the views of the people being taken into consideration. In fact the main areas which had Pop-Up consultation points seem to be the areas which are now being removed from the Green Belt, cleverly worded as “Inset from the Green Belt” One might think that ‘Inset’ meant included! Further to those initial consultations, this current DRAFT Local Plan seems to completely ignore the concerns of the local people regarding the loss of the Villages surrounding Guildford. Removing these villages will inevitably mean that the character of the whole area and Guildford Borough will be lost. Most of these areas are those with AONB status and other recreational value.

I have a particular concern about the way the Local Plan is worded and put together. Most people would not be able to wade through the vast amount of text and plans, evidence and policy which is quoted. It is not a simple document to read and is not summarised sufficiently. I think that each Parish Council should have responsibility for fully revealing the Draft Local Plan, showing the local impact, the impact on the Guildford Borough and in addition how that impacts on the whole region when taking other Borough Local Plans into consideration. Where have GBC included ideas from local residents?

I do not think the Draft Local Plan takes into account the real impact of huge areas of development around Guildford and beyond, after all we do not live in isolation of the rest of the South East and the huge traffic and transport problems we see on a daily basis on the M25, A3, M3, A31 and all the major train routes into London. These are what need addressing in the local plan. Furthermore, all the major arterial roads and side roads are at a standstill during most days rush hour (or 3) period and whenever there is any kind of incident. People generally have to travel away from Guildford to work and this has put more pressure on the local infrastructure. The Plan should be looking to address the real issues which currently exist. Why go for growth when the fact is that it is not sustainable in terms of everyday life. Local transport, local schools and access to the NHS services are way overstretched with children having to travel miles to a place at primary school, further burdening the transport system.

The DRAFT Local Plan identifies sites with current planning applications as available to increase housing quotas. Some have actually been refused on several occasions, including through the Appeals to the Secretary of State process. Why are these planning applications being included in the numbers, they are also not defined as affordable which is a wasted opportunity to provide additional affordable housing. Several areas around Shalford and Chilworth had been identified on the previous plan as areas for development; they are no longer included in the DRAFT Local Plan but are within the Green Belt. Chilworth in particular has already seen a vast increase in houses which are in no way affordable and to the benefit of the local population. It is obvious that once these areas are removed from the Green Belt there will be no protection against development, as development is considered to be ‘approved in principle’. This development is seen as growth, but for Profit; not in perpetuity. The DRAFT Local Plan also identifies areas to the north of Guildford and along the A31 Hogs Back corridor, for development; this area has also seen a substantial increase in density and areas for commerce and includes the University of Surrey plans which have already been agreed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9663   Respondent: 15485185 / Roland Mansell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to these areas being inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.

There are many brownfield sites and areas which remain open for development which could provide much needed affordable housing for the current population. There are also areas which could provide more housing with a little thought around redesign and redevelopment. This would not mean an influx of more people but affordable housing for the existing population. I believe that the plan is for profit and does not provide for the needs of the current residents of Guildford. Where does the DRAFT Local Plan identify the type, size and potential value of these developments? Where does the Draft Local Plan define affordable, with examples of who would be able to afford to live in these houses. Anybody under 35 looking for a property from 1st April 2016 is now being confined to house sharing and room renting. Where does the plan identify this problem?

Why take swathes of the Green Belt countryside that make this area so beautiful and cover it in concrete, just to line the pockets of the house builders. Once it is gone, there is no going back. I am disappointed in the Draft Local Plan and object most strongly. This is nothing more than the road to a dormitory Guildford Borough, property rich and socially and environmentally poor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9664  Respondent: 15485185 / Roland Mansell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have a particular concern about the way the Local Plan is worded and put together. Most people would not be able to wade through the vast amount of text and plans, evidence and policy which is quoted. It is not a simple document to read and is not summarised sufficiently. I think that each Parish Council should have responsibility for fully revealing the Draft Local Plan, showing the local impact, the impact on the Guildford Borough and in addition how that impacts on the whole region when taking other Borough Local Plans into consideration. Where have GBC included ideas from local residents?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPA16/2322</th>
<th>Respondent: 15485217 / Fiona MacKenzie</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the lack of evidence for the alleged housing need numbers (693 a year), and no real explanation as to why The 'Plan' allows for such a disproportionate level of development in one area of the Borough. In light of the recent vote for Brexit the need for new homes will probably reduce, and we may also be facing a crash in the property market, in the not too distant future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9667</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- lack of specific details as to how the existing infrastructure is to be improved to cope with all the additional planned development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9666</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- the loss of the Greenbelt, which will inevitably lead to further development, putting further strain on an already overstretched infrastructure in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/9665</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This 'Plan' is ill-conceived, badly thought through, and needs to be scrapped.

I would also like to know why the consultation period has been so limited, especially with a decision of such magnitude (2,000 homes at Gosden Hill and, potentially, over 6,000 planned new homes in total), which will have far-reaching implications on the overall quality of life of residents in the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: SQLP16/1291</th>
<th>Respondent: 15485217 / Fiona MacKenzie</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- lack of any real information as to how the Council plans to deal with the additional traffic on the already congested road structure, PLUS plans (if any) to deal with increased pollution and deterioration of air quality.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/9668</th>
<th>Respondent: 15485249 / Paul Rochester</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
I am writing to state my objection to the Guildford Local Plan 2016 and in particular to the removal of Green Belt status from the villages of Shalford and Chilworth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2323  Respondent: 15485281 / Fiona Stobart

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2328  Respondent: 15485281 / Fiona Stobart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am concerned by the lack of any evidence for the alleged housing needs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4434  Respondent: 15485281 / Fiona Stobart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/4436  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4435  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9674  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<tr>
<td>I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<tr>
<td>I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic. I object to the lack of proper infrastructure planning for sites (Policy I1) The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

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I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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I object to poor air quality concerns (Policy I3)
The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

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<tr>
<th>Comment ID: PSLPP16/9670</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9672  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9677  Respondent: 15485281 / Fiona Stobart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I often stay with my sister Anne at the above address and have done so for the last 30 years. It is a true pleasure to roam around this lovely area of Surrey. So green and verdant. A true gem.

I was upset to hear of the proposed building by Guildford Borough Council to build so many houses in the Horsley area. Over 2000 on Ripley Airfield and over 500 in the Horsley area.

I find the situation appalling to even consider. My reasons are:

The local roads will not be able to sustain another 4000 cars

The trains to London will have to board another 1400 people

Where are 1400 people going to park their cars?

There is no local Bus service

The local schools will not be able to take another 2000 children

I am told by locals that the local Medical Centre are full to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2330</th>
<th>Respondent: 15485345 / Ruth Beavington</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/4444  Respondent: 15485345 / Ruth Beavington  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9698  Respondent: 15485345 / Ruth Beavington  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9693  Respondent: 15485345 / Ruth Beavington  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9705  Respondent: 15485345 / Ruth Beavington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9706  Respondent: 15485345 / Ruth Beavington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to poor air quality concerns (Policy I3)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/9695  **Respondent:** 15485345 / Ruth Beavington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

**I object to development in areas at risk of flooding (Policy P4)**

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9690  **Respondent:** 15485345 / Ruth Beavington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9696  **Respondent:** 15485345 / Ruth Beavington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9694  Respondent: 15485377 / Steve Andrews  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have just read the Guildford Local Plan and feel I must register my objection on a number of important issues :

The proposal to remove remove Ripley, Send and Clandon from the Greenbelt will completely change the character of the local environment. I do not believe there are any special circumstances to allow you to do this. Once these villages are removed from the green belt their unique identities will be lost forever as more properties will be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9692  Respondent: 15485377 / Steve Andrews  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This will have a significant impact on local infrastructure such as roads, medical facilities and schools which are already full.

The villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley which I use to access the A3 from Pyrford. Further development within Ripley which will cause this to become a bigger bottleneck for traffic.

I do not believe you have fully considered the environmental impact of removing countryside from the greenbelt. The air quality of residents will deteriorate due to increased traffic and building within Ripley and Send will increase flooding risk.
lower down the Wey catchment. I do not believe the local sewer infrastructure will be able to handle the additional population growth.

I strongly believe that the guildford area does not need this development at any cost

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9700</th>
<th>Respondent: 15485409 / Barry &amp; Janet Oakley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No infrastructure to cope with the increase of traffic.

The lack of provision for new schools Doctors surgeries etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No protection of any wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9699</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The in-setting of any villages removal of the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9697  Respondent: 15485409 / Barry & Janet Oakley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of Ripley for 17 years where we wanted a quiet village life we are appalled to hear of the recent plans for Ripley and surrounding villages and the fact that these plans were only given 6 weeks to object.

Our objections are:

The disproportionate amount of development in one area of the borough .

Site A43 Garlicks Arch
Site A45 The Talbot
Site A57 The paddocks
Site The paddocks

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1292  Respondent: 15485409 / Barry & Janet Oakley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This government was voted in by the electorate on a mandate of trust.

They have not been elected to carry out projects such as this which is a complete betrayal of the trust placed on them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2337  Respondent: 15485441 / John Thornton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to your local plan as currently proposed for the Horsleys

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4271  Respondent: 15485441 / John Thornton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have read your proposed local plan and particularly the suggestions with regard to East and West Horsley – including Wisley airfield.

I fully understand the need for a steady increase in new housing to meet the demands of a growing population. But your plan seems far too aggressive in its proposal to increase the size of settlement areas such as East Horsley and to effectively take the village out of the green belt. Based on previously declined proposals for Wisley airfield I fail to see how you could find a workable proposal to put a new town on this site without the essential amenities – it would become a strange ghetto.

The Horsleys should contribute to meeting the need for increased housing in the borough. But this should be done in a way that is sensitive to the current environment and without any need to remove green belt ‘status’.

I Object to your local plan as currently proposed for the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Based on previously declined proposals for Wisley airfield I fail to see how you could find a workable proposal to put a new town on this site without the essential amenities – it would become a strange ghetto

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The Horsleys should contribute to meeting the need for increased housing in the borough. But this should be done in a way that is sensitive to the current environment and without any need to remove green belt ‘status’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I have read your proposed local plan and particularly the suggestions with regard to East and West Horsley – including Wisley airfield.

I fully understand the need for a steady increase in new housing to meet the demands of a growing population. But your plan seems far too aggressive in its proposal to increase the size of settlement areas such as East Horsley and to effectively take the village out of the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. I object to the proposed Infrastructure Schedule (Appendix C)  
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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</table>
1. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
   The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

   As the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4456  Respondent: 15485473 / Eilish Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)
   Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

   The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

   The site is not appropriate because:
   • There is no sustainable transport infrastructure.
   • The site is liable to frequent flooding
   • It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
   • There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4457  Respondent: 15485473 / Eilish Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)
   There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

   Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4455  Respondent: 15485473 / Eilish Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
   North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9719  Respondent: 15485473 / Eilish Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
   The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)
   There is too much traffic in the villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in the area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic. Furthermore, cycling is a popular past time within this area and brings plenty of tourism. However, with extra cars on the road, and perhaps using the rural roads, there is a probability that more cyclist deaths will occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
   The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9721   Respondent: 15485473 / Eilish Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)
   The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9714   Respondent: 15485473 / Eilish Smith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to not protecting the Green Belt (Policy P2)**
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. If this development goes through, further green belts within Surrey will be destroyed and eventually Surrey will turn into an extension of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **I object to development in areas which are at risk of flooding (Policy P4)**
   The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **The development proposed is not sustainable (Policy S1)**
   13,860 new houses proposed is not sustainable – it will damage local communities by over development. There is a certain charm about the area and the surrounding area which will be destroyed with the development of new houses. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every household will have to have a car, if not a few more. The Plan contains nothing to improve the infrastructure for Garlick’s Arch. This will have a knock on effect to all surrounding roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the Borough Wide Strategy (Policy S2)**
   GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

   The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

   5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am writing to OBJECT to your plans to remove SEND VILLAGE from the green belt. I have never heard such a silly idea.

I OBJECT to plan A42 this is on prime agricultural land and the access on and off would be onto a very narrow lane and would affect the wildlife which inhabits this area, there are deer forces of a multitude of birds of which come into my garden i.e gold finches, chaffinches 4 different types of sets of black birds, pheasants and also RED KITES which would be driven away and no longer give me the opportunity to watch them, at 85 they are great pleasure also the extra traffic it would put on the main road which is always brought to a standstill and very blocked up. I OBJECT STRONGLY.
I OBJECT A44 plan again this is a Very Narrow lane and would spoil the area and bring uproar to a quiet road and spoil the quiet area.

I OBJECT to the A43 plan for lands at Garlicks Arch this again is undesirable on a quiet area with all sorts of wildlife and ancient woodlands etc again too the amount of extra traffic which it would generate at least a 1000 more vehicles and cause even more chaos on the roads. Have you ever tried to get get to Guildford and beyond on an afternoon around 4-430 from this area it is absolutely grid locked on both the old and the new A3 it is horrendous. The roads and infrastructure are not fit for purpose with schools, shops, doctors etc etc.

The councillors were voted on the borough and promised to save the Green Belt.

I OBJECT PLEASE READ OUT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9720  Respondent: 15485537 / Paul Hatton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel that there has been insufficient consideration of SPA, SSI and any Conservation Area issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9718  Respondent: 15485537 / Paul Hatton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The openness of Green Belt land needs to be cherished, respected and permanently protected. This way, Green Belts will protect our countryside and help regenerate our cities. If you go ahead with this, extremely valuable Green Belt land will be lost forever and can never be replaced.

I strongly object to the proposals for building housing on Green Belt land in Ripley, especially on the areas including Wisley Airfield, Garlick’s Arch (Ripley/Send border) and Gosden Hill (Clandon).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10703  Respondent: 15485537 / Paul Hatton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposals for building housing on Green Belt land in Ripley, especially on the areas including Wisley Airfield, Garlick’s Arch (Ripley/Send border) and Gosden Hill (Clandon).
I feel that there has been insufficient consideration of SPA, SSI and any Conservation Area issues.

The openness of Green Belt land needs to be cherished, respected and permanently protected. This way, Green Belts will protect our countryside and help regenerate our cities. If you go ahead with this, extremely valuable Green Belt land will be lost forever and can never be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2340  Respondent: 15485569 / Jack Griffith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the housing plan for the Horsley’s
For taking Horsley out of the greenbelt, lack of planned infrastructure and doubt over the proposed housing numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2343</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<tr>
<td>1. I object to the lack of evidence and openness for the alleged housing need numbers, and believe the SHMA figures is too high when compared with other local boroughs.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<tr>
<td>1. I object to A25 Gosden Hill Farm site of over 2000 homes, this is a huge over development in Green Belt and will cause congestion on the trunk roads A3 / M25.</td>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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<td>Comment ID: PSLPS16/4467</td>
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<td>Comment ID: PSLPS16/4463</td>
<td>Respondent: 15485601 / Tim Jewers</td>
<td>Agent:</td>
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</table>

1. I object to the A35 Wisley Airfield site, over 2000 homes in Green Belt, is an unsustainable development and will cause congestion on the trunk roads A3 / M25.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

1. I object to the late inclusion of site A43 Garlicks Arch in Green Belt and ancient Woodlands.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

1. I object to site A43a the “on off” ramp at Burnt Common / Clandon, this will increase traffic and add another junction to an already dangerous and congested A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
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<tr>
<th>Comment ID: PSLPP16/9728</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to site A45 The Talbot, this is over development in Green Belt and a conservation area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9735</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the cramped over development of sites, which are out of keeping for the rural area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/9732</th>
<th>Respondent: 15485601 / Tim Jewers</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the lack of real affordable homes in the Local Plan, GBC should be building 'council homes' for rental to young people / families.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of planned infrastructure for local roads, air quality, public transport and the reliance of the developer to provide this.

1. I object to the increased population numbers which will overwhelm local healthcare, policing and social welfare facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9737  Respondent: 15485601 / Tim Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to insufficient consideration of the Thames Basin SPA, SSSI, SNCI sites and conservation areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9725  Respondent: 15485601 / Tim Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to creating new Green Belt whilst taking away existing Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/9736</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. I object to any insetting / removal of any villages from the Green Belt.

1. I object to the loss of Green Belt and breaking protection promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/9734</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

1. I object to the Local Plan's aim to impose massive new towns at 'strategic' sites. I am not against development but I would prefer that each existing town / village provide the numbers of homes required in ratio to their size. This is an organic and far more sustainable way of growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the disproportionate amount of development in one area of the Borough.

1. I object to the disproportional and large sites in relation to rural locations, for example doubling the Lovelace Ward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9730  Respondent: 15485601 / Tim Jewers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan because the developments proposed are not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1297  Respondent: 15485601 / Tim Jewers  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to GBC not providing a readable, concise summary and for the continuation of releasing new data after the Plan was published in June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1298  Respondent: 15485601 / Tim Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to GBC not appearing to liaise with other neighbouring boroughs to fully understand the massive implications of development in the South East.

Continuing to work in silo's will bring chaos to the already over populated and poluted South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1296  Respondent: 15485601 / Tim Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to GBC not listening to local people in 2015 and continuing to impose the same style of Local Plan in 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/952  Respondent: 15485601 / Tim Jewers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITE A42 TANNERY LANE, SEND

The increase from 45 to 60 new homes. This may seem small but with poor public transport in the area every home will be reliant on cars.

I strongly object to this thoughtless development in the NE of the borough. The subsequent increase in traffic, pollution and overcrowding is a recipe for traffic disaster and poor air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

SITE A43 GARLICKS ARCH

The revised plan is increasing the number of homes to a minimum of 400 on what is Greenbelt Land. This and other proposed developments in the north of the borough is in danger of harming the rural nature of the surrounding villages of Send, Ripley, and Clandon.

Inclusion of 6 Travelling Showpeople plots and associated storage facilities is totally inappropriate in a rural environment in Greenbelt land. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]. There is no identified need within the Local Plan document for this allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SITE A58 BURNT COMMON

This increase of industrial floor space from 7000 sq m to an unspecified amount and the addition potential for a Waste Management Facility at this site does not provide local residents full and proper consultation rights.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/951  Respondent: 15485601 / Tim Jewers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITE A58 BURNT COMMON

This increase of industrial floor space from 7000 sq m to an unspecified amount and the addition potential for a Waste Management Facility at this site does not provide local residents full and proper consultation rights.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4470  Respondent: 15485665 / Lynne Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to build houses, an industrial park and roads on the slopes of the Hog’s Back. This is an AONB and should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6691  Respondent: 15485665 / Lynne Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large scale development of green belt land, in particular at Normandy/Flexford. A46 I object to the introduction of SANGs to justify using agricultural or wooden land as recreation areas in order to justify building elsewhere. I4 I object to the proposal to build houses, an industrial park and roads on the slopes of the Hog’s Back. This is an AONB and should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9741  Respondent: 15485665 / Lynne Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University of Surrey should be building the necessary student accommodation (that they promised in 2003) so that they do not overspill into the town, thereby distorting the required housing figures. The University impact does not appear to be managed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9742  Respondent: 15485665 / Lynne Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

More affordable housing is required using brown field sites within the town. Not more shops! Green belt developments tend to be large properties which will not assist the people that the Local Plan is designed to help.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>I object to the large scale development of green belt land, in particular at Normandy/Flexford. Guildford has 89% land of green belt and 44% land AONB. I understand that a number of houses and services are required over the next 20 years but believe small scale development is preferred over large developments which put extra burden on our already overcrowded road system. There should be no development of green belt without local resident agreement.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to the introduction of SANGs to justify using agricultural or woodland as recreation areas in order to justify building elsewhere. We do not need any more SANGs if we do not build on the green belt &amp; AONB.</td>
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Finally, there appears to have been little consultation with Resident Associations or Parish Councils. Is GBC actually listening at all?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1299  Respondent: 15485665 / Lynne Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The transport evidence is weak and major issues are unresolved. The Hindhead Tunnel (a great success) has impacted on Guildford and now A3 disruption is mostly centred on Guildford. The topography of hills & river make it difficult but a realistic plan is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2348  Respondent: 15485729 / Rica Jepsen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the above proposed Local Plan which affects the Horsleys.

My reasons for objection are as follows:

1. Both West Horsley and East Horsley villages will be removed from the Green Belt and there is legal no justification for this approach to be adopted.
2. The proposed new homes to be built within a very short space of time will increase the burden on the existing infrastructure including inadequate roads, car parking, local schools and medical facilities. In addition, there is also inadequate drainage to deal with wastewater and surface water and many places suffer flooding when there is heavy rainfall.
3. The density of the proposed development appears to concentrate on three major development sites in West Horsley which will completely destroy the rural village effect of West Horsley. I have lived in West Horsley...
since 1979 and I have specifically chosen to stay in West Horsley where there are open fields retaining the rural feel of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9748  Respondent: 15485761 / Dominic Carpenter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I think the plans would cause overcrowding to all local services especially the local traffic which is already very congested so therefore I am opposing the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4473  Respondent: 15485793 / Anita Urwin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor
stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I would like to formally Lodge my objection to the proposed local plan, this is just another proposal of building schemes destroying our local community. Ripley village and surrounding areas have had considerable development recently, destroying our village Way of life. What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>The infrastructure has never been upgraded and any further developments would add pressure on this already overstretched services What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE 2016 DRAFT LOCAL PLAN!??

I am only 12 years of age and I do not want to grow up in a busy, polluted area. I like to feel safe in my environment which I currently do as my village is small and friendly with lots of fields to play on with my friends. If 2000 more homes, industrial and business sites and a railway station are added to my surroundings I will not feel so happy as millions of people would be traveling through my area every week. This will not only hurt me but many others of my similar age too. If we are to go through with this plan it will result in 5000+ more vehicles on our roads causing pollution in our currently clean area. Building on the Green Belt will mean thousands of animals losing there homes and possible extinction in some species. This will also harm the bees which I know we are trying to look after at the moment due to low numbers. I know this sounds extreme but it could even put us at risk!

YOU DON'T WANT TO LOSE THE GREEN BELT FOR EVER DO YOU?

I OBJECT TO THE 2016 DRAFT LOCAL PLAN!??

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2352  Respondent: 15485889 / Joanne Saunders  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To Whom It May Concern:

From day one this has been a very underhand process, which I believe, proves that we are not living in a democracy!! It’s the same old story that if you know the right people and give the right handshake then anything is possible. You have listened to dishonest councillors and greedy developers but noone has actually listened to the families that will be affected.

I am listing below my objections and the reasons for those objections. I cannot believe that again I having write the same things as before.

I object to the following:

1 I object to: Building 45 houses at Clockbarn nursery
2 I object to: Send Village being removed from the Green Belt!
3 I object to: New interchange with the A3 at Burnt Common
I object to: building 400 houses and industrial space at Garlicks Arch

As already stated in my previous three letters to yourselves, Tannery Lane cannot accommodate the amount of traffic that the new developments will bring. We have already had an accident on Send Road this month where a child got knocked down and many near misses on the junction of Tannery Lane.

This is a LANE not a main road and is not meant to be one. Send village is a Village not a TOWN and is not meant to be one.

The current infrastructure cannot cope with any additional residents as the Doctors Surgery currently services 3 villages at present. It can be very difficult if not Impossible sometimes to get an appointment within a month.

The local schools, although being redeveloped and becoming a through Primary will still only be able to cater for the same amount of pupils, although, Secondary places will definitely be a problem.

The greenbelt prevents places like Send and Ripley and Send marsh from becoming an extension of Woking and Guildford Town. It also serves a conservation purpose which as you clearly know is an extremely important function with our recent flooding issues. Developers, once they have the go ahead will not stop !!!!!!! and you wont be able to stop them as it will set a president.

Unfortunately due the way this whole plan was put together it has left local people with a very bad taste in their mouths. We do not trust anyone and we do not believe that even these objections will be taken seriously which will prove my point.

To summarise:

Our current infrastructure and busy roads in our village cannot cope with any further housing or increase in flow of traffic. I am concerned about the safety of not only our children but the elderly residents of our village who sometimes take chances crossing these roads to get to the busy park and shops…. I hope you will take my views into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of evidence for the alleged housing, type, size, infrastructure, access etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/9762  Respondent: 15485921 / Chris Nairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to

Any and ALL erosion of the Green Belt

Any “in setting” of villages from the Green Belt A plainly disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1303  Respondent: 15485921 / Chris Nairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
More than any other I OBJECT to the limited consultation period.

Which smacks of a lack of forward planning, a rushed, hasty and “desperate catch up “ or “opportune” timescale, to force decisions by stealth or reduce fair and thereby ignore proportionate objection.

This is plainly illustrated by the last minute inclusion of new sites with less than 2 x weeks notice, which I also OBJECT to.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

In simple terms this plan is a hastily presented “plan” more a collective dump of ideas with little wider consideration for people and future generations, the very opposite essence which you claim are the reasons for the plan.

Thank you for registering these objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence that this housing is required in such numbers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>I object to the allocation of land to the sites of Wisley Airfield, Garlicks Arch and Gosden Hill. This will have an enormous and permanent impact on these village communities.</td>
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<td>I object to lack of protection of heritage assets and the environment.</td>
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<td>I object to the strain put on existing services, such as the police and emergency services.</td>
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<td>I object to the lack of immediate provision of new schools and doctors surgeries.</td>
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I object to the strain put on the already strained infrastructure in these villages. Ripley high street is already crowded with cars, with little parking and the junction with Newark Lane is chaotic at peak times and many times during the day. Add many more homes to the mix and the route to/from the A3 would be strained to breaking point, not to mention liable to lead to accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the removal of Ripley, send and Clandon from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate amount of development in one part of the Borough. In a five mile distance 6500 homes are proposed to be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1305  Respondent: 15485985 / Jean Dunning  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the short consultation period and in particular to the last minute inclusion of more sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2358  Respondent: 15486017 / Neil Higgins  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan which is currently out for consultation. There are so many aspects of the Plan which are not acceptable. To list them all would take up an inordinate amount of your time reading, comprehending and responding to. Therefore I will just list the most obvious parts of the Plan which are unacceptable paying particular attention to those affecting the local parishes of Send, Clandon & Ripley:-

• I object to the use of a “Black Box” method which has been used by GBC to derive the housing target. I attended a meeting where the leader of the Council was unable or unwilling to shed any light upon the methodology or parameters used within the model. The annual number of new homes required quoted in the draft Local Plan exceeds the needs of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2359  Respondent: 15486017 / Neil Higgins  Agent: 
**Comment ID:** PSLPS16/4494  **Respondent:** 15486017 / Neil Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to a local plan which has not factored in the potential full effects arising from Brexit.
- I object to a Local Plan which has not factored in a reduction of student numbers as a consequence of Brexit.
- I object to a Local Plan which does not factor in the housing stock released due to students, currently renting from private landlords, no longer taking out leases from the private sector due to falling student numbers and additional direct University Housing Capabilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4496  **Respondent:** 15486017 / Neil Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to a Local Plan which does not consider flooding risks (Garlick’s Arch).
- I object to a Local Plan which seeks to decimate ancient woodland (Garlick’s Arch).
- I object to a Local Plan which does not consider the impact upon wildlife (Garlick’s Arch).
- I object to a Local Plan which seeks to include industrial usage on a greenbelt site (Garlick’s Arch) rather than using a Brownfield site (Burnt Common).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to a Local Plan which includes 400 houses and 7,000 sq feet of industrial usage (A43) in an area where only recently you correctly turned down an application for only 25 houses. Housing Need is not an exceptional circumstance which justifies the removal of land from the Green Belt. Simply because a Landowner and a Developer are seeking to make millions of pounds profit – that greed is not an exceptional circumstance which justifies the removal of land from the Green Belt. Neither is there an exception circumstance justified when those said Land owners and developers effectively offer a bribe of paying for the ramps to the A3 (A43A). On every moral and ethical test this is not something which can be justified and should be removed from the Local Plan.

I trust that you will consider all of the objections which I have raised above. That you will determine that all my objections are reasonable and as a consequence you will accept that the Local Plan, as currently written, is flawed and requires significant amendments before being presented again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4495  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the creation of ramps to and from the A3 at Garlick’s Arch / Burnt Common (A43A). The local roads already cannot support the existing volume of traffic. The new ramps would generate significant additional flows upon local roads creating numerous rat runs as commuters strive to save additional time. This pressure would not just be felt by the A247 but by narrow lanes e.g. those around East Clandon and Tithebarns Lane in Send.
- I object to a Local Plan which seeks to direct additional traffic onto roads (A247) which cannot be widened to accommodate the additional volume of traffic.
- I object to the creation of the ramps to and from the A3 at Garlick’s Arch / Burnt Common – These would generate additional noise to Local houses whilst significantly deteriorating the quality of air.
- I object to the creation of ramps to and from the A3 at Garlick’s Arch / Burnt Common since these would generate significant safety risks to those living in the immediate vicinity of the planned ramps (Tithebarns Lane) together with pedestrians, cyclists and other users of Tithebarns Lane – including staff and visitors to HMP Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9795  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to a Local Plan within which the Growth targets for new regional employment cannot under any sensible consideration be attainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9798  Respondent: 15486017 / Neil Higgins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to a Local Plan which seeks to urbanise rural centres by allowing for retail development within their scope

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9782  Respondent: 15486017 / Neil Higgins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the Local Plan focusing upon the wrong type of housing requirements – Why does the Plan not include the amount of Social Housing which is so desperately needed – “Affordable Housing” is not attainable by so many within the Borough – The needs of all residents should be being addressed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9791  Respondent: 15486017 / Neil Higgins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>• I object to a Local Plan which does not consider the infrastructure needs required to support that Plan</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>• I object to a Local Plan which reduces the Greenbelt without justification – Once lost this will never be replaced. We have a moral duty to all future generations to protect, except in the most extreme of circumstances, the legacy which has been handed down to our generation by our forefathers</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>• I object to a Local Plan which does not maximise the use of existing brownfield sites – These should be regenerated and used for housing – in particular the Social Housing which this flawed model does not correctly address. The Brownfield site at Burnt Common should be used for new housing needs and not the greenbelt site at Garlick’s Arch</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>I object to a Plan which has been generated in conjunction with developers who are seeking to line their pockets with no regard for the historic planning restrictions which have served the Community so well for so many years</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to a “Vision” which will create an urban sprawl from Guildford up to the M25. The Green belt is there for a reason – The clue is in the name</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am a resident of the Borough living at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I object to the revised draft local plan. The model used to calculate revised housing needs is still flawed and does not accurately reflect the temporary impact and needs of students enrolled at University of Surrey. Housing needs have been overstated.</td>
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I object to the revised local Plan because there is still not adequate infrastructure being implemented for the increased needs generated by the additional homes specified in the Draft Plan i.e. schools, doctors, dentists, shops and most importantly the impact upon local roads which would naturally follow if the draft local plan were to be implemented has not been addressed.

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I trust that all of these objections, together with those which I submitted when the previous iteration of this Local Plan was made open to comment, will be taken into account when finalising the Local Plan. That final version should simply address the needs of the community and not reflect the desires of developers and land owners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2155  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2160  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2161  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

I object to Policy A58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4493  Respondent: 15486049 / Ceri Schooling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of proper infrastructure planning for sites
I object to the lack of infrastructure for sites like Garlicks’ Arch. Where are the residents going to school and what GP surgery will they belong to?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of Utilities Capacity
The utilities won’t be able to cope

I could continue but there are so many issues with the plans that they are fundamental.

Please review them urgently

Lack of proper infrastructure planning for sites
I object to the lack of infrastructure for sites like Garlicks’ Arch. Where are the residents going to school and what GP surgery will they belong to?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Unsuitability of our local roads for heavy vehicles and more traffic**
The local roads in the area are very narrow.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Poor air quality concerns**
I object as it will mean greater air pollution.

**Unsuitability of our local roads for heavy vehicles and more traffic**
The local roads in the area are very narrow.

**Congestion on the local village roads and lanes**
I object as more traffic would mean terrible congestion for villages and lanes.

**Congestion on the trunk roads, A3/M25**
I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours, it would only make transport much worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Not protecting the Green Belt
I object to the proposals to remove Ripley, Send and Clandon from the Green Belt. We must protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9792  Respondent: 15486049 / Ceri Schooling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Unbalanced allocation of development in one area of the Borough
Why should one area have so much development in the Borough, unbalanced and therefore I object

Disproportionate size of sites in relation to rural locations
I object to the size of the sites at Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). They are totally disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10717  Respondent: 15486049 / Ceri Schooling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate size of sites in relation to rural locations
I object to the size of the sites at Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). They are totally disproportionate.

Unbalanced allocation of development in one area of the Borough
Why should one area have so much development in the Borough, unbalanced and therefore I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours, it would only make transport much worse.

5. Congestion on the local village roads and lanes
I object as more traffic would mean terrible congestion for villages and lanes.

6. Unsuitability of our local roads for heavy vehicles and more traffic
The local roads in the area are very narrow.

7. Poor air quality concerns
I object as it will mean greater air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4498  Respondent: 15486081 / Rosie Ainsworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4499  Respondent: 15486081 / Rosie Ainsworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4500  
Respondent: 15486081 / Rosie Ainsworth  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4501  
Respondent: 15486081 / Rosie Ainsworth  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4503  
Respondent: 15486081 / Rosie Ainsworth  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9811   Respondent: 15486081 / Rosie Ainsworth   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9812   Respondent: 15486081 / Rosie Ainsworth   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9809   Respondent: 15486081 / Rosie Ainsworth   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Page 2314 of 2543
| Comment ID: | PSLPP16/9810 | Respondent: | 15486081 / Rosie Ainsworth | Agent: |
|-----------|--------------|-------------|--------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/4502 | Respondent: | 15486113 / Ian and Margaret Walker | Agent: |
|-----------|--------------|-------------|-----------------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A41 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

2 - Objection to the number of houses being built in the four proposed sites - specifically policy A41:

A suggested 35 percent increase in housing in West Horsley is a monstrous figure for this community. Vast developments impinge on the rural nature of villages and destroy the very reason why people want to live there.

The purpose of the Green Belt is to provide 'lungs' for a Metropolitan Area and West Horsley village serves that purpose. This particular proposal to build 90 homes on the open fields will destroy that. For ever it's been possible to take quiet
country walks starting at Lollesworth Lane across to the Sheepleas and beyond, appreciating the rural aspect from the start.

As a Nation we need to protect villages like West Horsley and concentrate on developing in areas where there IS sufficient infrastructure to support new homes. Guildford Borough Council need to consider this very carefully and ensure that the much needed new homes that are built are not going to impact on this valuable commodity which once lost can never be retrieved.

This is not a NIMBY objection but an appeal for common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9807  Respondent: 15486113 / Ian and Margaret Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to object to the Local Plan proposals for West Horsley on the following grounds:

1 - Objection to removing West Horsley from the Green Belt:

The Local Plan categorically states "that we will continue to protect the Metropolitan Green Belt " - understandable, as the fact is, the village has absolutely no infrastructure in terms of doctors, very limited bus service, one small shop, poor roads and a school already operating at capacity.

We were resident at 23 East Lane for over 30 years until 2007 and continue to visit regularly as one of our sons bought the property and now lives there with his family. Since we left the infrastructure has not changed apart from the fact that there is no longer a post office and the traffic has increased considerably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2362  Respondent: 15486177 / Daniel Peyton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPS16/4508</th>
<th>Respondent: 15486177 / Daniel Peyton</th>
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I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4511  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4512  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4513  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9821  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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Comment ID: PSLPP16/9822  Respondent: 15486177 / Daniel Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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I wanted to draw your attention to my objection to the proposed developments in West and East Horsley and the surrounding areas. It seems there have been no sound reasons given for the proposed changes which seem to be aimed solely at increasing land available within the settlements for future additional development.

I am also opposed to the village’s removal from the Green Belt by insetting and extending the 003 Local Plan Settlement Area boundaries. West Horsley Parish is one of a rich and varied mix of established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors through the seasons each year. This added to your proposed circa 3,000 additional houses will ensure the Village infrastructure falls apart.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

The local schools are already full. The Medical facilities are stretched. Drainage is inadequate and roads and car parks are overloaded with little or no scope for improvements. Traffic around the area is generally getting heavier and the villages have not been built with such a high density of housing or population in mind.

Without a doubt your proposed plans are going to ruin the local villages, the infrastructure won’t be able to cope and the scale of increase has alarming results (up to 35% in existing west Horsley households - greater than any other single area in the Borough).

I sincerely hope you will reconsider your plans that are going to have a detrimental effect on the whole borough.

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**Attached documents:**

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Comment ID: PSLPP16/9830  Respondent: 15486305 / Noel Ainsworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9831  Respondent: 15486305 / Noel Ainsworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9828  Respondent: 15486305 / Noel Ainsworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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Attached documents:

Comment ID: PSLPP16/9829  Respondent: 15486305 / Noel Ainsworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2367  Respondent: 15486817 / O.J. Howe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am 29 years old and have lived in Horsely most of my life and I write to object to the above proposed new local plan and what you propose to do with taking land out of the green belt to create additional housing in West Horsely of up to 385 homes.

This is totally unfair for everyone that lives in the village- what right do you have to propose a plan that does not account for the views of the local residents?

These proposals will have massive detrimental effect on our homes and our lives. All the initial consultation on the strategy and the various objections appear to have been ignored.
West Horsley as a village does not have the facilities for the population to be increased by this amount. The school is oversubscribed and so is the medical centre.

I therefore strongly object to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Page 2326 of 2543
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/4539  Respondent: 15486849 / Eric Waestaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4540  Respondent: 15486849 / Eric Waestaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9844  Respondent: 15486849 / Eric Waestaff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
| **Comment ID:** | PSLPP16/9846 | **Respondent:** | 15486849 / Eric Waestaff | **Agent:** |
|----------------|----------------|-----------------|-------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 | **Do you consider this section of the document; complies with the Duty to Cooperate?** | ( ) | **is Sound?** | ( ) | **is Legally Compliant?** | ( ) |
| **Answer (if comment is on questions 1-7 of the questionnaire):** | () | | | | | | |

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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| **Comment ID:** | PSLPP16/9839 | **Respondent:** | 15486849 / Eric Waestaff | **Agent:** |
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| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 | **Do you consider this section of the document; complies with the Duty to Cooperate?** | ( ) | **is Sound?** | ( ) | **is Legally Compliant?** | ( ) |
| **Answer (if comment is on questions 1-7 of the questionnaire):** | () | | | | | | |

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4657  Respondent: 15486881 / Mark Langton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4574  Respondent: 15486881 / Mark Langton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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I OBJECT to The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9959  Respondent: 15486881 / Mark Langton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9906  Respondent: 15486881 / Mark Langton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2414  Respondent: 15486913 / Sarah Langton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4714  Respondent: 15486913 / Sarah Langton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4658  Respondent: 15486913 / Sarah Langton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9922  Respondent: 15486913 / Sarah Langton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9960  Respondent: 15486913 / Sarah Langton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/9905  Respondent: 15486913 / Sarah Langton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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Attached documents:

Comment ID:  PSLPA16/2413    Respondent:  15486945 / J Hazelton    Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID:  PSLPS16/4712    Respondent:  15486945 / J Hazelton    Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9862  Respondent: 15486977 / P Jefferson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9863  Respondent: 15486977 / P Jefferson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2393  Respondent: 15487009 / Yvonne Peyton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4686  Respondent: 15487009 / Yvonne Peyton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4684  Respondent: 15487009 / Yvonne Peyton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

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Comment ID: PSLPS16/4593  Respondent: 15487009 / Yvonne Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPS16/4594  Respondent: 15487009 / Yvonne Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Attached documents:

Comment ID: PSLPS16/4647  Respondent: 15487009 / Yvonne Peyton  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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**Comment ID:** PSLPP16/9945  
**Respondent:** 15487009 / Yvonne Peyton  
**Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Comment ID:** PSLPP16/9981  
**Respondent:** 15487009 / Yvonne Peyton  
**Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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**Comment ID:** PSLPP16/9870  **Respondent:** 15487009 / Yvonne Peyton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Attached documents:

**Comment ID:** PSLPA16/2394  **Respondent:** 15487041 / S Comfy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPP16/9871  Respondent: 15487041 / S Comfy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Comment ID: PSLPA16/4533  Respondent: 15487105 / Keith Pew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID:  PSLPA16/2396  Respondent:  15487137 / P Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/4694  Respondent:  15487137 / P Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/4681  Respondent:  15487137 / P Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4590  Respondent: 15487137 / P Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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Attached documents:

Comment ID: PSLPS16/4597  Respondent: 15487137 / P Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and

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Comment ID: PSLPS16/4645  Respondent: 15487137 / P Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPP16/9942  Respondent: 15487137 / P Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9877  Respondent: 15487137 / P Doherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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Comment ID: PSLPP16/9941  Respondent: 15487169 / Emily Wigfall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9978  Respondent: 15487169 / Emily Wigfall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/9878  Respondent: 15487169 / Emily Wigfall  Agent:
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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

I OBJECT to The Talbot Ripley as this is over development in an open space within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Respondent: 15487201 / Samantha Dale</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4559  Respondent: 15487233 / Lindsey Schravetta  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4560  Respondent: 15487233 / Lindsey Schravetta  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4561  Respondent: 15487233 / Lindsey Schravetta  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4562  
Respondent: 15487233 / Lindsey Schravetta  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4563  
Respondent: 15487233 / Lindsey Schravetta  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4564  Respondent: 15487233 / Lindsey Schravetta  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9887  Respondent: 15487233 / Lindsey Schravetta  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9889  Respondent: 15487233 / Lindsey Schravetta  Agent:

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Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9884  Respondent: 15487233 / Lindsey Schravetta  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9885  Respondent: 15487233 / Lindsey Schravetta  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2400  Respondent: 15487265 / Helen Smith  Agent:
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4701  Respondent: 15487265 / Helen Smith  Agent:

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4676  Respondent: 15487265 / Helen Smith  Agent:

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Attached documents:

Comment ID: PSLPS16/4601   Respondent: 15487265 / Helen Smith   Agent:

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Comment ID: PSLPS16/4633   Respondent: 15487265 / Helen Smith   Agent:
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Attached documents:

Comment ID: PSLPP16/9881  Respondent: 15487265 / Helen Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Attached documents:

Comment ID: PSLPP16/9882  Respondent: 15487265 / Helen Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2376  Respondent: 15487297 / L.A. Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment, which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4565  Respondent: 15487297 / L.A. Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4566  Respondent: 15487297 / L.A. Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

I OBJECT to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I OBJECT to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I OBJECT to the proposal in the local plan on the grounds that a wasteland solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I OBJECT to the proposal in the local plan on the grounds that the proposed development site (A44) was used as OBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I OBJECT to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of the proposed site mark it as "refuse and slag heap". It is therefore unsuitable for such a development on health reasons.

I OBJECT to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be the case. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.
I OBJECT to the proposal in the local plan on the grounds that both Envirosearch report RS1100201 _1 _1 dated 17th February 2004 concludes "potentially contaminative industrial sites identified from analysis" of Ordnance survey maps.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9886  Respondent: 15487297 / L.A. Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have concerns over the strain the additional proposals will place on local resources. The roads in the surrounding area will not be able to cope with the addition of some 800 vehicles of local traffic. It is also my belief that the current local surgery will be overstretched with the addition of houses proposed causing a backlash for current residents.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9891  Respondent: 15487297 / L.A. Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch should have required another full consultation, which did not happen. This invalidates the whole process.</td>
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I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4674  Respondent: 15487329 / Adam Sadler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4586  Respondent: 15487329 / Adam Sadler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9974  Respondent: 15487329 / Adam Sadler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9883  Respondent: 15487329 / Adam Sadler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2404  Respondent: 15487361 / Roger Dean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4703  Respondent: 15487361 / Roger Dean  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4673  Respondent: 15487361 / Roger Dean  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:

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**Comment ID:** PSLPS16/4605  **Respondent:** 15487393 / Nicola Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** PSLPS16/4630  **Respondent:** 15487393 / Nicola Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** PSLPP16/9933  **Respondent:** 15487393 / Nicola Ford  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPA16/2406 | Respondent: 15487425 / B Pryor | Agent: |
|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
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| Comment ID: PSLPS16/4705 | Respondent: 15487425 / B Pryor | Agent: |
|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
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| Comment ID: PSLPS16/4671 | Respondent: 15487425 / B Pryor | Agent: |
|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/9892  Respondent: 15487425 / B Pryor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPA16/2407  Respondent: 15487457 / Aidan Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/4706  Respondent: 15487457 / Aidan Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4670   Respondent: 15487457 / Aidan Beckett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4582   Respondent: 15487457 / Aidan Beckett   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common,
Send Marsh and Ripley. The development of 400 homes at the Garlick’s Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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Comment ID: PSLPS16/4607  Respondent: 15487457 / Aidan Beckett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4628  Respondent: 15487457 / Aidan Beckett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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Comment ID: PSLPP16/9929  Respondent: 15487457 / Aidan Beckett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Comment ID: PSLPP16/9969  Respondent: 15487457 / Aidan Beckett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/9894  Respondent: 15487457 / Aidan Beckett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4581  Respondent: 15487489 / Luke Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

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Attached documents:

Comment ID: PSLPS16/4608  Respondent: 15487489 / Luke Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and

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Attached documents:
Comment ID: PSLPS16/4625  Respondent: 15487489 / Luke Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9928  Respondent: 15487489 / Luke Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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Comment ID: PSLPP16/9966  Respondent: 15487489 / Luke Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/9895  Respondent: 15487489 / Luke Draper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Attached documents:

Comment ID: PSLPA16/2377  Respondent: 15487521 / A Malcmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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Comment ID: PSLPS16/4567  Respondent: 15487521 / A Malcmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
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Comment ID: PSLPS16/4569  Respondent: 15487521 / A Malcmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Comment ID: PSLPS16/4572  Respondent: 15487521 / A Malcmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4573  Respondent: 15487521 / A Malcmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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Attached documents:

Comment ID: PSLPP16/9902  Respondent: 15487521 / A Malcmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

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<th>Comment ID:</th>
<th>PSLPS16/4580</th>
<th>Respondent: 15487553 / Nicholas Eager</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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Attached documents:
Comment ID: PSLPS16/4665  Respondent: 15487585 / Debbie Eggleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

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Comment ID: PSLPS16/4579  Respondent: 15487585 / Debbie Eggleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPS16/4610  Respondent: 15487585 / Debbie Eggleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/4578  Respondent: 15487617 / C Sheriff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Comment ID: PSLPS16/4611  Respondent: 15487617 / C Sheriff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Attached documents:
### Questionnaire Responses

**Comment ID:** PSLPS16/4661  **Respondent:** 15487649 / Paul Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4577  **Respondent:** 15487649 / Paul Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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**Attached documents:**

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**Comment ID:** PSLPS16/4577  **Respondent:** 15487649 / Paul Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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Attached documents:

Comment ID: PSLPS16/4612  Respondent: 15487649 / Paul Adams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Attached documents:

Comment ID: PSLPS16/4621  Respondent: 15487649 / Paul Adams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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Comment ID: PSLPP16/9924  Respondent: 15487649 / Paul Adams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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Comment ID: PSLPP16/9962  Respondent: 15487649 / Paul Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Attached documents:

Comment ID: PSLPP16/9901  Respondent: 15487649 / Paul Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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<tr>
<td>I am sending this email to formally object to the taking out of Chilworth, Shalford and Peasmarsh with possible other villages from the Green Belt areas. This is obviously designed to enable many more houses to be built in these areas.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPA16/2379  Respondent: 15487745 / Jon Korndorffer  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9912  Respondent: 15487745 / Jon Korndorfer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The expansion should be constrained to protect the character of the town and country in our congested gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9914  Respondent: 15487841 / National Federation of Gypsy Liaison Gro (A. R. Yarwood)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Consultation: Proposed Submission Local Plan: Strategy And Sites 2016

I am responding to the above consultation on behalf of the National Federation of Gypsy Liaison Groups.

We consider the plan to be unsound, non-compliant with National policy and it will not be effective in meeting the needs of Gypsies and Travellers.

Policy H3 refers to a requirement that pitches for Travellers pitches will be permitted to meet an identified need provided it is within easy walking distance of a settlement. This is unacceptable as sites so close to settlements will rarely if ever be acceptable to local communities.

The policy also requires that pitches for Travellers pitches must meet or contribute to meeting the local; affordable housing need and that they are secured as affordable homes in perpetuity. This is clearly quite inappropriate for Traveller sites.
Furthermore both elements of the policy require favourable consideration of Traveller pitches to be reliant on meeting an identified need. This is inconsistent with national policy. Paragraph 10 of Planning Policy for Traveller sites requires Local Plans to set out criteria to deal with applications irrespective of need.

Paragraph 4.2.49 says Traveller exception housing will be provided on council owned public pitches on small, suitably located sites in the Green Belt. This is not consistent with Green Belt Policy P2 which does not allow for such development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp17q/150  **Respondent:** 15487841 / National Federation of Gypsy Liaison Gro (A. R. Yarwood)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

We consider the plan to be unsound, non-compliant with National policy and it will not be effective in meeting the needs of Gypsies and Travellers.

Some of the allocated sites are only temporary and some limited to particular occupants. These cannot therefore be regarded as fulfilling the long term need for Traveller sites.

There is a complete absence of any policy guidance to deal with applications which are received for new Traveller pitches. PPTS requires that Local Plans must provide policy guidance to deal with applications which come forward where there is no identified need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/4627  **Respondent:** 15487905 / Claire Norman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to register my support for retaining the above allotment site.

My father and I both have plots on the site and since my father retired his allotment has been a lifeline for him, not only as a social, but also as a mental health benefit. If he did not have the allotment, his mental health would have suffered greatly. My grandfather also had a plot on the site, and my partner and I currently have a plot, so three generations of our family have had allotments on the Westborough site. This heritage is very important and this community-led site has been in existence since before the First World War.

The retention of the front access (behind St Josephs School) off Aldershot Road is also critical as there is no hardstanding for cars at the top of the site, and when it rained heavily recently, my partner and I parked on the grass which turned into a bog and we were stuck there for an hour trying to dig the car out.

The group WASHA work very hard and run an educational plot on the site for St Joseph’s School which I believe has won a prize. Creating an interest in gardening is critical for children of a young age as it teaches them about biodiversity, the importance of caring for the environment, and about healthy eating. I am a school counsellor and there are many school children suffering from obesity. In addition to changing to more healthy meals at school, it is educationally beneficial to teach children where food comes from and stimulate that interest at an early age about the environment. This teaching also links to School’s yearly Harvest Festivals which have a strong relationship to the allotments.

It is very sad that every few years we need to campaign for our cause, to save our allotments. This is a benefit for the community and we need to try and protect what little green spaces we have left from the threat of new builds. I therefore strongly believe that allotments should be included on the list of green spaces under ‘green and blue infrastructure’ under para 4.6.31 of the draft plan (p. 116) and I wholly support Policy I4 (Green and Blue Infrastructure).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2381  Respondent: 15487937 / David M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Periodically, I come down from the haze and dust of London and stay with my brother in East Horsley. The fresh air, the fields full of horses and sheep is a joy to see. So therefore, I strongly object to Guildford Borough Council proposals of taking the Horsley area out of Green Belt and to propose such a colossal building programme of 2000+ houses on Ripley Airfield and over 530 houses in Horsley.

The schools will not be able to cope with at least another 2000 children

The roads will not be able to cope with an extra 4000 cars.

At least 1500 persons will want to use Horsley station in already overcrowded trains

Where will 1500 people park?

On many occasions, I have walked to my brothers house in East Horsley on flooded roads. So where is all the water going to go with such ancient drainage?
Please take note of my concerns with regard to such a massive house building scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2382  Respondent: 15487969 / H.P.L. Jepsen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the above and hereby put on record my very strong objection to it.

I have lived in West Horsley since 1978 and can not see any justification whatsoever for removing East & West Horsley from the Green Belt. It would completely destroy the character of the villages and put enormous pressure on local infrastructure i.e. roads, drainage, schools, health service etc.

I therefore strongly urge you to drop this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2383  Respondent: 15488001 / Mark Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident in West Horsley and I wish to inform you of my very strong objection to this village and surrounding areas being taken out of the Green Belt. The plans for development will destroy everything that makes the Horsleys a wonderful place to live. I moved to the area last year purely on the basis of the setting of the village, the community, the relatively small population and of course the beautiful countryside.

I previously lived within the M25 with its large estates, pollution, high levels of traffic and crime. I certainly do not want Horsley to go the same way, which would be inevitable if removed from the green belt.

The village is already struggling to provide for its current residents i.e. parking at the doctors surgery is always very difficult, schools over-subscribed and some of the roads are in a dangerous state (East Lane being a prime example)
I STRONGLY OBJECT to Horsley being removed from the Green Belt and to the proposed planning developments.

Please do not destroy one of only a few areas of outstanding beauty. I fully appreciate the need for more housing and for it to be affordable housing, but I think it more appropriate to expand already existing urban areas rather than destroy country villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10441  Respondent: 15488001 / Mark Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1).

The proposed number of 13,860 new houses in the area of Ripley, Send and Glandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring more cars to the area as most households have more than one vehicle.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be relocated to urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2384  Respondent: 15488033 / Bradley Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The phasing of housing development and transport infrastructure are out of kilter. Gosden Hill is shown to be phased in from 2021 onwards but improvements to the A3 are to be delivered in the period 20123-2027. There will be a huge period of time where the existing A3 has to cope with additional demand. As a daily user of the A3, this will result in me having to adjust my schedule significantly to compensate for the extra traffic that I will encounter. As we move into a more 'sustainable' era, motorists sitting idle with their engines running for longer surely doesn't help achieve this goal? Keeping people moving will help dampen this environmental impact.

Not only is this out of kilter but the allocation of the most suitable site for the proposed A3 tunnel entrance for housing is shortsighted and a detriment to the whole of Guildford who desperately need to have the A3 traffic jams solved.

I hope you take this objection, and the many others, seriously, and abandon the proposed plans to the Burpham & wider Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The London Road (one of the main roads into the town centre) does not have the capacity to include a bus lane and a cycle lane, furthermore, the current Bus system does not warrant the need for an extra lane. The designation as a sustainable movement corridor cannot be correct as the road is not wide enough and the traffic is already horrendous queuing the full length from The Parkway to the A3100 Clay Lane. The costs and disruption, in my view, clearly outweigh any benefits that might be gained, certainly, this won't encourage residents to drive less.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4636  Respondent: 15488065 / Heather Beaver  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4637  Respondent: 15488065 / Heather Beaver  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4640  Respondent: 15488065 / Heather Beaver  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4643   Respondent: 15488065 / Heather Beaver   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9918   Respondent: 15488065 / Heather Beaver   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9919   Respondent: 15488065 / Heather Beaver   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/9916  Respondent: 15488065 / Heather Beaver  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/9917  Respondent: 15488065 / Heather Beaver  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4639  Respondent: 15488097 / Ben Cornwell LLP (Nick Cobbold)  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Emerging local Plan Consultation - Proposed site allocation for the travelling community off Rose Lane, Ripley

We have worked in a professional sense for Alexander Stewart Clark, the owner of the two large industrial buildings off Rose lane and we have watched from a distance (occasionally advising our client) as the travellers who have setup camp off Mr Stewart Clark's track have used the system to get the site that they live on established in the planning system.

We note that Guildford Borough Council's emerging local Plan Document, the Proposed Submission local Plan, is currently out for consultation and it is with dismay that we note that this initial development plan document includes this traveller site as a potential permanent allocation.

In suggesting this site as an allocated traveller site, it appears that the Council has taken the path of least resistance because the residents are already present. We must remind you that the occupiers of the site have, for many years, been in breach of planning regulations. The planning history of the site includes dismissed planning appeals as well as a court in junction to vacate the site-yet nothing has happened and they remain in situ. In brief, this includes the refusal of Planning permission (PP) for the use of the land as a caravan site for 2 static caravans and 3 touring caravans in February 2010 and an enforcement notice (EN) followed. Appeals against the PP and EN were dismissed in September 2010. A high court challenge against these decisions was dismissed in April 2013 and the EN came into effect to clear the site by 14th June 2014. A subsequent application was submitted on 8th May 2014, a month before the EN was due to be complied with and using a change in national policy as the way to have are consideration and delay an enforcement notice.

The last of these applications was refused by the Borough Council and the most recent appeal decision was issued on 3pt July 2015 and granted the appellants temporary planning consent to remain on the site for three years. There are three important conclusions that the Inspector makes in the decision and all point at a site being unsuitable for the proposed use:

- The proposal encroaches into the countryside and is therefore contrary to the purposes of the Green Belt in conflict with policies RE2 and H13 of the GBC local Plan.
- The development of the site detracts from the appearance of the area and is "harmfully out of keeping with its rural setting". The application is contrary to policies G5 and H13 of the GBC local plan.
- There would be some harm to the setting of the Ripley Conservation area.

All these issues would usually result in the refusal of planning permission. However, the Inspector went on to consider the need for traveller sites and concluded that, If the appeal was to fail, there is nowhere for the appellant and extended family to live as "they could not conceive of living in bricks and mortar”. The Inspector also had regard to the personal needs of the family with particular regard to the needs of the children and a nomadic existence would make education and healthcare difficult. The removal of the family from the site would “undoubtedly result in Article 8 of the European Convention of Human Rights being engaged”.

When assessing Human Rights, the Inspector is obliged to "strike a fair balance between the rights of the individuals concerned and the interests of the community”. In making this balance (and he considers in detail both sides of the argument) the Inspector concluded that "the harm to the Green Belt is not clearly outweighed by other considerations and that permanent planning permission should not be granted”.

He concluded that the planning balance is different for a temporary decision because harm would be limited in time and reduced. The Inspector was satisfied that the Council will provide traveller sites inline with the requirements above and he
was "satisfied that there is a real likelihood that sites will become available so that circumstances will have materially changed by the end of a temporary planning permission. Permission is therefore granted for 3 years."

At no point did the Inspector say that this was a suitable site for a travellers' site. In fact, every conclusion made by the Inspector stated that it was not a suitable site for the continued residential use. The Borough Council have a duty to consider these conclusions in preparing the new local plan. It is clear that the Council are taking the easy route here and have effectively concluded that, as that the site has a temporary planning consent, it might as well remain. The Council has failed to take into account the negative conclusions made by the Inspector focusing only on the headline of the appeal decision rather than the conclusions made within. In other words, it is effectively endorsing the approach of the residents to move to the most desirable site possible- in this case, on the edge of the pleasant village of Ripley and its conservation area -and then to find any change in policy to force the Council to reconsider their case, prevent vacation and ultimately have the location ratified through the new local plan.

Whilst we appreciate that the Council has a duty to find traveller sites as part of the emerging local plan, these must be broadly consistent with the Government's policy and not seek to go against national advice (or the Council run the risk of the local plan being found “unsound”). This site must be viewed as though it was an empty and undeveloped site.

In terms of the location of traveller sites sustainability is an important consideration in assessing the acceptability of proposed gypsy pitches. The NPPF is underpinned by the "presumption in favour of sustainable development" and this presumption is evident throughout the Planning Policy for Traveller Sites notably in the following locations:

- Paragraph 4, bullet point 8-" The government's aims in respect of traveller sites are to increase the number of traveller sites in appropriate locations...." 
- Paragraph 11 -"LPA’s should ensure that traveller sites are sustainable economically, socially and environmentally” .
- Paragraph 21 -"Applications should be assessed and determined in accordance with the presumption in favour of sustainable development"
- Paragraph 23-"LPAs should strictly limit new traveller site development in open countryside that is away from existing settlements".

This site is completely detached from the edge of Ripley and is therefore located in the open countryside away from existing settlements. To allocate it as a site, GBC would need to remove the site from the Green Belt as the proposed use is not one of the acceptable land uses in the Green Belt. This will effectively create an island of Greenfield land (noting that, despite being occupied, it is not classified as previously developed land) otherwise surrounded by Green Belt, unless the Council are planning on a larger release of Green Belt around Ripley-however this is not suggested on the allocations map.

This suggested allocation should be reconsidered otherwise the local Plan examiner will be asked to contradict the findings of his colleague in the recent appeal decision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4644  **Respondent:** 15488129 / Alan & Barbara Maddows  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings

Although we live outside the borough of Guildford, we have a greater interest in what goes into the Guildford Local Plan than those living on the far side of the borough. With this in mind we would like to object most strongly to the Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings with the following reasons:

- We object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- We object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- We object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- We object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- We object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- We object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.
These objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified these serious concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4654  Respondent: 15488161 / Kim Hesmondhalgh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial and a highway on the slopes of the Hog's Back at Blackwell Farm which will:

- destroy views from the Hog's Back ridge - a nationally designatea Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the Green Belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2386  Respondent: 15488193 / Tracey Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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<th>PSLPP16/9934</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the above proposed development. I do not believe that it is for the good of Guildford in any shape or form. We do not have the necessary infrastructure to support it nor is anything satisfactory proposed. With the current levels of traffic on the hogs back, the level of accidents along this section of the A3 with no safe place for emergency vehicles and close proximity to the hospital thus endangering the lives of many people with gridlocked traffic, the whole proposal is pure madness. I am shocked that it has got as far as it has. Not to mention this is an area of outstanding beauty and greenbelt!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/10  Respondent: 15494945 / Simone Wilkins  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above proposed development for the following reasons:

Policy A26-para 4.1.9:

1) This has been classed as an Area of Outstanding Beauty in the past but this has been conveniently disregarded in order to allow developments to take place on this land. I'm not sure what's changed?

2) Office space proposed in the current development will further increase traffic on the A3 at peak times.

3) Ignores current infrastructure problems as highlighted by independent study on the traffic and seems to want to add further to them. This could prove very dangerous around the Royal Surrey Hospital. Also due to the fact there is no hard shoulder the police/ emergency service have no where to pull over resulting in the A3 having to come to a complete halt causing gridlock chaos.

4) Air pollution already exceeds EU limits for Nitrous Oxide.

As a resident of Beechcroft Drive already struggling to enter and exit via the A3 due to increased traffic with a young baby and after also suffering a stroke 2 weeks after giving birth, I'm appalled that we are being left until there is a serious accident on this junction before anything is done. I can assure you that if anything happens to me and my child on this junction I will ensure that my family make sure it is on the front on every national newspaper. This proposed development is going to make a difficult junction even harder. Drivers do not keep to the 50mph limit and it's just a matter of time before there is a fatality. Please don't add to an already dangerous situation.
With the widening of the A3 a real possibility from 2020, we need to address the infrastructure before we gridlock Guildford with new developments in this section of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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Comment ID: PSLPS16/4666  Respondent: 15494977 / Carol Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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Comment ID: PSLPS16/4667  Respondent: 15494977 / Carol Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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Comment ID: PSLPS16/4669  Respondent: 15494977 / Carol Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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Comment ID: PSLPP16/9947  Respondent: 15494977 / Carol Adams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4677  Respondent: 15495041 / J D Clarkson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand the owners of Garlick's Arch are gifting the land for these new slip roads. What the plan does not make clear is that Policies A43 and A43a are actually inter-dependent in that the gifting of this land is dependent on the owner's receiving planning consent for housing.

The Garlick's Arch site has a number of problems with it that will, in no doubt, lead to lengthy delays in its development. For example the site is in Flood Zone 3, the existence of four pylons on site and the ancient woodland.
The Garlick's Arch site was included in the Plan at the twelfth hour—it has not been the subject of the rigorous scrutiny that has been applied to all other sites. I cannot understand why it was a last minute replacement for another site, Burnt Common, that has been the subject of prior development as it already has on it three industrial units. Furthermore this site was previously highlighted as important in meeting the industrial needs of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4675  Respondent: 15495041 / J D Clarkson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal is to build 400 new homes in Send with no provision for the infrastructure that will be required to support it (for example schools, health care facilities etc.). Send is a small village and will be swamped by such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9951  Respondent: 15495041 / J D Clarkson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, the impact of the increased traffic will be a disaster for local residents. The plan for the roads hinges on the provision of two new slip roads but these are not likely to be delivered until 2021 at the earliest and may be as late at 2033. Each slip road is likely to cost £10m. I strongly suggest that these will not be delivered and even if they are it will be long after the damage to the local environment has been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4688  Respondent: 15495169 / Joseph Clarke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
I am writing to express my extreme concern over the plans for development on site A26 (Blackwell Farm). Having lived in the area my whole life, I cannot stress enough the strength of my objection to these plans. This area of outstanding natural beauty deserves to be protected. The increase in traffic this would cause, resulting in a huge increase in both noise and air pollution, along with the excess land required to sustain the new road infrastructure are just some of the immensely damaging and irreversible consequences of this poorly thought out plan.

I hope you understand the importance of what is at stake here, and I stress again my sincere objection to these plans.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPA16/2389</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4691  Respondent: 15495201 / Viliv Viana  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4692  Respondent: 15495201 / Viliv Viana  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4693  Respondent: 15495201 / Viliv Viana  Agent:
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<td>I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.</td>
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<td>I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt</td>
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</table>
**Comment ID:** PSLPP16/9955  **Respondent:** 15495201 / Viliv Viana  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2391  **Respondent:** 15495233 / Harriet Philips  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4715  **Respondent:** 15495233 / Harriet Philips  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4718  Respondent: 15495233 / Harriet Philips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4719  Respondent: 15495233 / Harriet Philips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4720  Respondent: 15495233 / Harriet Philips  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed development on the site of the former Wisley Airfield.

The Spatial Vision notes… ‘Not all of the borough’s development needs can be met within Guildford’s urban areas. It is therefore proposed to focus some development on large strategic
greenfield sites which brings with it significant infrastructure.’

Please can you explain what significant infrastructure is available at the site of the former Wisley Airfield where you propose to create a new town.

As already observed, very little development will take place within Guildford’s urban areas. Nevertheless, two new rail stations are planned, Guildford East (Merrow) and Guildford West (Park Barn), presumably to support the additional 2,742 homes planned for Guildford. However, the new town planned for Wisley will be expected to use already over-extended stations at Horsley and Effingham Junction. In excess of 2,500 new homes (including those planned for the Horsleys) are proposed without any additional infrastructure beyond the addition of bus routes and a cycle path.

Assuming there is significant infrastructure that could make the former Wisley Airfield a candidate for development, I would still object to this proposal based on the level of detail provided in the plan. This proposal is a very significant intrusion into the green belt and the level of associated planning seems minimal. For example, the plan suggests the need for ‘…a significant bus network to serve the site and key destinations including Effingham Junction railway station and/or Horsley railway station’. However, the existing roads (commonly referred to as lanes) are insufficient to accommodate two buses passing, never mind a ‘significant bus network’. The consequences of this development will lead to very significant additional infrastructure work that is currently not envisaged in the plan and which will have a much wider impact on the green belt.

In short this proposed development can never be supported until a comprehensive and detailed plan is developed with a model showing how

- The current, very poorly maintained, road infrastructure will be impacted
- the Horsley and Effingham railway stations will be impacted
- the existing schools and medical facilities will be impacted
- disruption will be minimised for existing residents while such an extensive multi-year development proceeds
- the very real flood risk will be overcome
- the designated Site of Nature Conservation Importance will be protected
- listed buildings will be protected
- funding will be secured from multiple agencies over a multi-year budget cycle
- air quality will not be reduced
- the model should also illustrate the impact if (and surely when) the 2000 homes become 3000 and then 4000.

Of course, without a fact based explanation as to why the housing stock must increase by 25% (refer to Objection 1) it is not clear that this development is even needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extent of development planned within the Metropolitan Green Belt.

Policy P2 states that Guildford Borough Council ‘…will continue to protect the Metropolitan Green Belt.’ An explanation is required detailing how the green belt is being protected when greater than 65% of the proposed developments will take place on land currently within the Metropolitan Green Belt.

As an example, of the 13,860 planned new homes only 1,172 will be built in Guildford Town Centre and 1,570 in the Guildford urban area, that is a total of 2,742. On the other hand, 2,533 are planned to be built within a three mile radius of the Horsleys which is currently within the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9979  Respondent: 15495265 / Stephen McGuckin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing targets set out in Policy S2.

If the proposed plan were to be implemented, it would represent an increase in housing stock to support a population increase of 25%. However, the ONS projects a population increase of 15%.

I understand that the 25% increase is the result of a Strategic Housing Market Assessment which was conducted by an external consultant and based on a mathematical model. Critically however, the details of this model have not been explained in the plan. I further understand that Guildford Borough Council are also unaware of the basis of this mathematical model.

Given that the conclusions from the SHMA study underpin the entire plan, they cannot be accepted as an article of faith. The assumptions and algorithms must be fully explained and then subject to rigorous review. Furthermore, the differences between the Strategic Housing Market Assessment and the assessment of the ONS must be fully understood and reconciled.

Without such analysis it is difficult to understand how any responsible body could submit this plan for approval. Or perhaps GBC are simply following the advice from the film ‘Field of Dreams’ – build it and they will come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2401  Respondent: 15495297 / Daniel Perkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

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Comment ID: PSLPS16/4721  Respondent: 15495297 / Daniel Perkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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Comment ID: PSLPS16/4723  Respondent: 15495297 / Daniel Perkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

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I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</th>
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Comment ID: PSLPP16/9987  Respondent: 15495297 / Daniel Perkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9984  Respondent: 15495297 / Daniel Perkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9985  Respondent: 15495297 / Daniel Perkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2403  Respondent: 15495329 / Michelle Burton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send village being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Sends Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4730  Respondent: 15495329 / Michelle Burton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery because inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been given for 64 apartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The lane cannot take any more. The junction is too dangerous already and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the below proposed new developments for the below reasons. We accept that extra housing is needed, but it is important to get the numbers and locations right, which based on my objections below does not seem to be happening.

Please can my below comments be shown to the Planning Inspector who will make the decision. Please also send an email receipt that this has been received.

I OBJECT to building 400 houses and 7000 sq meters of industrial space at Garlick's Arch, opposite Send March Road. This will create unsustainable amounts of traffic on the already extremely busy Send March Road and Portsmouth Road. My busiest part of my journey to work in the morning is getting from Send March Road onto Portsmouth Road, and the queue of traffic is often down as far as the Saddlers Arms pub. It will become impossible to get onto Portsmouth Road with any additional houses or industrial space.

In addition, the site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford's housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/4731</th>
<th>Respondent: 15495329 / Michelle Burton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This much be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/4732</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set it beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3396  Respondent: 15495361 / Therese Elizabeth Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is not enough provision for schools

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2416  Respondent: 15495361 / Therese Elizabeth Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPS16/4734</th>
<th>Respondent: 15495361 / Therese Elizabeth Hill</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/4735</th>
<th>Respondent: 15495361 / Therese Elizabeth Hill</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/4736</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of...
Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Related documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Related documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13819  Respondent: 15495361 / Therese Elizabeth Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) The amount of traffic in our area has reached saturation point, I leave home over an hour early to get to school for 8 30, grid locks are normal events and tempers are always running high.

2) I live on an approach road to the A3/M25 getting out of the drive is very dangerous, in fact I had a serious accident last year and I cannot leave my drive now unless a member of my family helps me. If any further developments happen around Ripley/Send the amount of traffic down Newark lane will increase even more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13820  Respondent: 15495361 / Therese Elizabeth Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is not enough provision of open spaces around the villages of Ripley, Send Wisley and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9990  Respondent: 15495361 / Therese Elizabeth Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9991  Respondent: 15495361 / Therese Elizabeth Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9988  Respondent: 15495361 / Therese Elizabeth Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Comment ID:** PSLPP16/9989  **Respondent:** 15495361 / Therese Elizabeth Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1619  **Respondent:** 15495361 / Therese Elizabeth Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5183  **Respondent:** 15495393 / M Rendell  **Agent:**

The real reason all these developers want to build round here is the return they get for their money. I object to any further erosion of our green belt to line the pockets of these money makers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreeBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 land at Burnt Common Ware house which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send,
Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4956  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5062  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4988  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A57 The Paddocks for the provision of 4 travellers pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10333  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/ West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10532  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9992  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10451  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4740  Respondent: 15495425 / Chris Roe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.0 INTRODUCTION

Introduction

1.1 This representation has been prepared by WYG on behalf of the site owners Mr & Mrs Roe, who are the owners of land at Waterloo Farm. Mr and Mrs Roe have been members of the Horsley Community for over 44 years and have resided at Waterloo Farm for some 28 years. There are currently three generations of their family living and participating in the communities of East and West Horsley, and each will continue to do so for the foreseeable future. Mr and Mrs Roe support the principle of sustainable expansion of the Horsleys which has been delayed/deferred for decades.

1.2 This Representation is submitted in support of Waterloo Farm (hereon known as the Site) which is a proposed allocation within the draft Local Plan, with the potential to accommodate a number of dwellings, and has been identified as part of a wider allocation and policy – Draft Local Plan reference A40.

1.3 Please take full account of previous Representations particularly that dated September 2014 (attached as Appendix A for your reference).

Site and Surroundings

1.4 The Site provides an excellent opportunity to accommodate new homes in a suitable and sustainable location. Waterloo Farm is described by Guildford Borough Council (GBC) Planning Department as being a large, detached dwelling within a curtilage of about 1.35 ha (3.34 acres). In addition to the dwelling house there are two ancillary residential outbuildings.

1.5 The Site is essentially “wedge” shaped and orientated North/South. The principle south and south eastern boundaries immediately adjoin Nightingale Crescent (Nos 34-44) and Northcote Crescent (No 51). We understand that Nightingale Crescent was originally part of Waterloo Farm estate which was acquired by GBC in 1947 for residential development. The western boundary is shared with the Camping and Caravanning Club of Great Britain. The immediate adjoining land is a copse which forms an effective barrier with the site. In addition there is a purpose built brick two storey facilities building which also houses a reception office and shop for visitors.

1.6 The Site is accessed via a non-adopted private road which runs from Ockham Road North and currently serves the Caravan site, Waterloo Farm and Lake and Shepherd Cottages. The owners of Waterloo Farm retain right of way and access rights over the lane.

1.7 Detailed Planning permission, since lapsed, was granted in 2010 (Ref 10/P/01550) for conversion of the barn to two residential units. An outline planning application was made for 3 dwellings at the southern end of the site in 2014 (Ref 14/P/00012). The application was refused essentially on the grounds of policy (Green Belt) It is clear that GBC have considered the Site suitable for residential development albeit in the event of a change of current policy towards the Green Belt.

1.8 The Site is included in the draft emerging Local Plan as a housing allocation of 120 units as part of a wider allocation including land held by Persimmon Homes. Persimmon Homes are also submitting a Representation for Policy A40. The Site has been promoted through the Local Plan process since 2008 and we are very pleased to see it included as part of a draft allocation and strongly support this.

1.9 The Site is surrounded by immediate residential development. The argument for sustainable development is enhanced by the existing established housing that encircles Policy A40, and which runs along Green Lane, Ockham Road North and Nightingale Avenue.
1.10 The Site is sustainable, available and deliverable and can provide for housing within the next five years to meet GBC short term need.

1.11 The proposed adjustment of the Settlement Boundary, as it effects Waterloo Farm, could be described as “rounding off” and would complement a nucleated pattern of development appearing as a natural, unobtrusive extension to the existing boundary.

2.0 HOUSING AND POLICY CONTEXT

Guildford BC planning context & housing numbers

2.1 This representation is in response to the Regulation 19 consultation phase for the pre-submission version of the draft Local Plan. WYG are pleased to have been given the opportunity to make representations on this concerning the Site and general planning matters within the Borough. WYG are also pleased that Guildford BC has acknowledged the significant challenges that the borough faces in delivering sufficient housing to meet its needs. The previous interim housing figure of 322 dwellings per annum agreed in May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The reliance on this figure has meant that Guildford BC has significantly under-delivered on their housing requirements over the past five years as shown in the below table:

<table>
<thead>
<tr>
<th>Year</th>
<th>Net completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/11</td>
<td>190</td>
</tr>
<tr>
<td>11/12</td>
<td>262</td>
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<tr>
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<td>234</td>
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<tr>
<td>13/14</td>
<td>137</td>
</tr>
<tr>
<td>14/15</td>
<td>242</td>
</tr>
</tbody>
</table>

2.2 As the housing completions above show, Guildford has not only been under-delivering against the now up-to-date Objectively Assessed Need (OAN) but there has also been consistent under-delivery against the interim housing target.

2.3 The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR notes:

“The number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need…contributes to a growing deficit of new homes”.

2.4 The recommendation within the AMR following this states that:

“Housing provision is currently restricted by the lack of available and deliverable development land in the borough….delivery rate is only likely to increase when larger areas of land are suitable and available for development”.

This shows the necessity for suitable and available sites to be considered and this should apply to all sites within the borough that meet this criteria. Our client is the landowner of Waterloo Farm and the Site is available for development. We have set out below the reasons as to why the site should be considered suitable and deliverable in order to assist in the supply of land to contribute to meeting the chronic housing needs in the Borough. Consideration should be given to the Site as suitable and available regardless of its designations.

Objectively Assessed Need
2.5 Guildford Borough has an identified (OAN) of 693 dwellings per annum following the conclusions of the West Surrey Strategic Housing Market Assessment (SHMA) produced in September 2015 by GL Hearn. This assessment was carried out as part of the Housing Market Area (HMA) known as West Surrey which included Waverley and Woking in addition to Guildford.

2.6 The most recent population projections produced by Office of National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000. This increase is anticipated to be greater than shown by the 2012 population figures. The 2012 figures informed the SHMA which in turn has provided the basis around which the housing requirement for the new Local Plan is formed. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity to London, strong rail connections and reputation as being part of the commuter belt and a desirable place to live. It is on this basis that we would question the validity of the figures and believe that the OAN to inaccurate and should be revised upwards taking into account the increases based on the 2014 projections as opposed to the 2012 figures. This should, in turn, mean that the housing requirements in the new Local Plan should also be revised upwards and the identification of other sites for development should be considered as part of this process.

**Five-year supply of deliverable housing land**

2.7 Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to:

   “Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5%...where there has been a record of persistent under-delivery of housing, LPAs should increase the buffer to 20%”.

2.8 It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.5 years supply whilst at worst this drops to 1.4 years. It is therefore clear that without significantly more available land, Guildford cannot expect to be able to show a five year supply. The NPPF para 83 states that “Green Belt boundaries should only be altered in exceptional circumstances”. However, as the site is surrounded by development, and is in many respects an area of “washed over” Green Belt, we conclude that the site should be looked on favourably as a suitable development site in the 0-5 year time frame.

**Housing requirements within new Local Plan (2013-2033)**

2.9 The pre-submission version of the draft Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA. The draft Local Plan states that:

   “The delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites”.

The draft Local Plan sets out the housing delivery in different tranches as below:

<table>
<thead>
<tr>
<th>Year</th>
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<td>2032/2033</td>
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</tr>
<tr>
<td>2025/2026</td>
<td>700</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2.11 The above shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements are achieved, over the first five years of the plan an average of 693 dwellings per annum are to be delivered. This raises an immediate concern given that GBC cannot demonstrate a five year land supply of any better than 2.5 years. As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. Therefore it is vital that existing allocations in the draft Local Plan are retained and that those which are suitable and deliverable, particularly within the near future, such as the 120 deliverable units in allocation A40 at Waterloo Farm, remain within the Plan and are supported in coming forward as soon as possible within the 0-5 year time frame.

3.0 JUSTIFICATION FOR THE ALLOCATION

Horsley in Plan Making

3.1 The site was identified within the previous emerging Local Plan which was released in 2014. The site has been promoted throughout the development of the emerging Local Plan process and previous representations for this site were submitted in September 2014 as part of the Local Plan consultation under regulation 18 (attached as Appendix A for your information). In addition, the proposed development of part of the Site has been the subject of a formal Outline application submitted by Alliance Planning (now part of WYG) for 3 houses (reference 14/P/00012). This application was refused at the time for 4 reasons. Reason 1 was due to the site location, outside of any housing allocation and within the Green Belt, and is the subject of this and the previous representations. Reasons 2-4 relate to technical matters and developer contributions which could all be overcome in any future application submission.

3.2 Importantly, the refusal raised no issues in relation to:

- Highways and Transport
- Residential Amenity
- Mains Drainage and Utilities Provision
- Trees and Vegetation; or
- Ecology.

Senior Planning Officers (Policy) visited the site and walked the boundaries in March 2014. Details of discussions are included as part of Appendix C.

3.3 The emerging Local Plan, through the draft strategy and sites document, has allocated the land at Wisley Airfield for a mixed use development, including the provision of up to 2068 dwellings. The recently refused planning application (planning ref: 15/P/00012) has shown the difficulty in achieving a consent through a local decision and a reliance on a possible determination through appeal. This creates a great deal of uncertainty as to whether the anticipated housing as part of this proposed development can be delivered in a timely manner and therefore contribute to the Borough’s pressing housing need. Therefore the reliance on such a site should be limited. It is possible that up to 2100 dwellings may have to be delivered elsewhere in the borough. We recommend therefore that suitable nearby sites should be taken forward where there is a clear ability to deliver housing numbers. This would apply to the site at Ockham Road North. We therefore recommend that the Council should consider all sites that are considered suitable and deliverable and this particular site is one which meets these criteria. We strongly suggest the allocation should remain when taking the pre-submission plan to examination with the existing quantum of development as identified. If however, the Council decides not to allocate this wider site, the Waterloo Farm site should in any case be included in the settlement boundary, as it is already enclosed on all sides.

Access

3.4 There is a suitable road access to the site, which currently serves the Caravan site, Waterloo Farm and Lake and Shepherd Cottages, the additional traffic generation and pedestrian footfall for a small number of dwellings would not result in any transport concerns. The existing access/egress into the site is therefore considered to be appropriate. As part of the wider allocation, it is our understanding that suitable upgrades will be made to both the access road and the junction with Ockham Road North, where necessary to accommodate 120 units or the existing road would be suitable with minor
improvement if the Waterloo Farm site only is allocated (included within the settlement boundary, excluded from the Green Belt).

**Flood Risk**

3.5 Previous concerns have been raised concerning flooding matters. The previous representation for the regulation 18 was accompanied by a Flood Risk Assessment prepared by Peter Brett Associates see Appendix B. Persimmon Homes have conducted further extensive work regarding this aspect which has been submitted as part of their representation for the site, which concludes that:

“The modelling work also incorporated climate change allowances in line with newly released Environment Agency/ DCLG guidance. This detailed modelling has clearly shown the Environment Agency’s mapped flood extents to be overestimating the actual scenario…”

Their modelling further demonstrates that suitable mitigation can be provided onsite to overcome this technical matter lowering the flood risk on the site and therefore the principle of development, and therefore a deliverable allocation on this site should be considered as appropriate, notwithstanding the previous refusal.

**Sustainability**

3.6 The site is located a short walk from the centre of Horsley and situated alongside existing residential development. The site represents a logical infilling of available land to the rear of Nightingale Avenue to the south. Para 14 of the NPPF states that a presumption in favour of sustainable development is at the heart of planning, which should be seen as a golden thread running through both planmaking and decision-taking. There is an existing wide footway running along Ockham Road North which provides a safe pedestrian route that is used by a large number of people to access the centre of east Horsley.

3.7 The settlement hierarchy, published in May 2014 and used as part of the evidence base for the emerging Local Plan, notes that East Horsley has a population of 3,785 (2011) and is ranked as the 3rd most sustainable location within the borough (out of 32). In addition to the highly rated sustainability of East Horsley, the site lies close to West Horsley which is ranked as the 13th most sustainable location within the borough (out of 32).

3.8 The site is located less than a mile away from the centre of East Horsley where many of the local facilities which can serve residents’ day-to-day needs are found. The main line rail station is also located close to the high street and this allows good access to London Waterloo via a train service which takes under an hour and includes stops at larger stations such as Leatherhead, Epsom, Wimbledon, Clapham Junction (east) and Guildford (west); allowing access to large employment areas and facilitating onward travel.

3.9 Raleigh Primary, Glenesk Preparatory and Montessori Nursery are within 1/2 mile radius. Cranmore Nursery and Preparatory is within 2 miles. These schools provide suitable education for children up to the age of 11 and secondary school education is provided by Howard of Effingham and Manor School which are within 2 miles of the site in nearby Effingham. We note that Raleigh School is also within the draft allocation to be enlarged and relocated to Policy A41. This proposal is one of few infrastructure projects being considered as part of the plan and we are also in support of this much needed facility.

3.10 The Site lies on Ockham Road North exactly midway (some 2 miles) between direct access to the A3 etc and the A246 (Guildford /Leatherhead/Epsom). These two direct road access points ensure high sustainability of the site and allow further access on to the M25 road network which links to Heathrow and Gatwick airports in addition to the wider national strategic road network through the M3, M4 and M40 motorways. This allows for the development to have a suitable mix of transport options through either using the strategic road network or utilising the train line. Access to the train line is provided by a wide footway and the road from the site down into East Horsley is 30 mph and is considered to be safe for all to use. The Infrastructure Delivery Plan (IDP) states that there are to be additional highway improvements made within the West and East Horsley areas through a traffic management and environmental improvement scheme which is to planned to be delivered between 2019 and 2023. This would further enhance the highway safety with the local area through traffic calming measures as well as ensuring the character of the two areas remains as present.

3.11 The development of this small part of site A40 for several units would not require the highway works to competed first, as such this section of the site should be considered as deliverable within the 0-5 year time frame. For the wider site
there would be the opportunity to contribute to the traffic calming measures by extending the existing 30mph speed limit past the site access.

**Landscape and Visual Assessment**

3.12 The Site comprises an area of residential garden surrounded by trees and dense landscaping on all sides, with residential dwellings beyond on the south. The site is away from public rights of way and as discussed within the Regulation 18 representation, Officers walked the site and found it to be secluded with very few views in or out. Therefore the Site is considered to have low landscape impact and it does not contribute to the wider open landscape value of the Green Belt. This is further supported by the councils separate proposal to remove this area from the Green Belt altogether.

3.13 The Site, having an overall low landscape sensitivity and a low landscape value, is considered to have a high capacity to successfully accommodate residential development, particularly that of 2 – 2.5 storey residential development, sensitively designed through siting, layout and massing, set within the existing woodland buffer, complemented by a comprehensive landscape framework and green infrastructure proposals, resulting in very limited landscape and visual effects on the surrounding area, including the Green Belt. It should also be noted that a strip of land within this allocation is within the designated settlement boundary.

3.14 The combination of the low landscape character sensitivity and low visual sensitivity, result in low overall landscape sensitivity for the Site.

**Suitable Alternative Natural Greenspace (SANG)**

3.15 The Site falls within the 5km buffer zone of the TBH SPA at Ockham and Wisley Common and therefore, in line with saved policy NRM6 of the South East Plan, it is necessary to provide suitable mitigation for the proposed development. For this section of the allocation, if brought forward on its own, it would likely fall within the thresholds for a financial contribution to be provided as part of the development. Alternatively SANG may be provided onsite as part of the wider A40 allocation.

**Density of Development**

3.16 The overall allocation of A40 is 8 ha (some 20 acres). At 120 dwellings this would suggest a density of 15 per ha / 6 per acre. This would allow for a relatively low density so as not to result in the “over development” of the villages or a strain on services.

3.17 The Councils LAA February 2016 identifies the site as REF975: This document concludes that the side is acceptable in all respects subject to drainage having being relocated; the previous PBA report and attached PBA reports demonstrate acceptability in the respect

**4.0 CONCLUSIONS**

**Conclusion**

4.1 In conclusion, Site Allocation A40 represents the opportunity for a sustainable extension to what is one of the most sustainable settlements in the Borough of Guildford, and indeed is regarded as the most sustainable of the villages outside the urban areas of Guildford, Ash and Tongham. It is well connected to the existing community and facilities which will remain accessible to prospective residents. The increase in population that results from this extension to the physical extent of the village also helps to support the continued viability of local services.

4.2 It has been demonstrated in this submission that the site is suitable for the development proposed as it is directly adjacent to and bound by existing areas of housing. The proposals would consolidate the form of the settlement in this location which would result in a less dispersed pattern of development than exists at present to the north of the main service centre at East Horsley. New development on this site would be fully contained both within the site itself and within the perceived extent of the village which lies further to the south. The Development in this location would not encroach into wider more open areas of the Green Belt further from the village. The plan also identifies the site as inset from the Green Belt, further supporting the case for the development of the site.
4.3 Housing development would be compatible with the surrounding land uses which are well-established and enclose our site. These include areas of housing to the north, east and south, and the Camping and Caravanning Club of Great Britain site to the west.

4.4 A summary of the benefits of the site are below:

- This site will provide several residential units in the Waterloo Farm part of the site with a total of 120 units across the allocation within a sustainable location.
- The settlement of East Horsley is an appropriate location for additional housing and is among the best performing villages in the Borough in terms of their sustainability credentials and in terms of the access these provide to local services.
- The proposed uses would be compatible with adjacent land uses.
- The site is well-contained and enclosed by existing physical features and development, forming a natural extension of and would be contiguous with the residential environment of the settlements of East Horsley and West Horsley.
- The site has defensible boundaries which will ensure that the development will not harm the purpose or openness of the wider Green Belt or landscape value.
- The site is not constrained by any other sensitive planning designations.
- The site would not impact materially on any existing residential properties.
- The site is deliverable within 1 – 5 years, there being no insurmountable obstacles or technical issues to delivery in terms of highway, drainage, SPA or the capacity of existing utilities.
- The scheme will generate section 106 contributions and provide SANG mitigation.

4.5 The site should be allocated as the wider site A40, or if not, Waterloo Farm as a further inset from the Green Belt in this part of Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- A098810 Appendix B FRA.pdf (1.9 MB)
- A098810 Appendix A Regulation 18 reps Chris Roe.pdf (2.2 MB)
- A098810 Reg 19 Form Chris Roe.pdf (309 KB)
- A098810 Reg 19 A40 Representation Chris Roe.pdf (931 KB)

Comment ID: PSLPA16/2555   Respondent: 15495457 / R Laroche   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. I object to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5185  Respondent: 15495457 / R Laroche  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5122  Respondent: 15495457 / R Laroche  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreeBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4875  Respondent: 15495457 / R Laroche  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the inclusion of strategic site Policy A43 Garlick’s Arch and its late substitution in the local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick’s Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 land at Burnt Common Ware house which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick’s Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4957  Respondent: 15495457 / R Laroche  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5063  Respondent: 15495457 / R Laroche  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4989  Respondent: 15495457 / R Laroche  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A57 The Paddocks for the provision of 4 travellers pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10335  Respondent: 15495457 / R Laroche  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/ West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10547  Respondent: 15495457 / R Laroche  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/10435</th>
<th>Respondent: 15495457 / R Laroche</th>
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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/2417  **Respondent:** 15495489 / Stephen Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4741  **Respondent:** 15495489 / Stephen Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4742  **Respondent:** 15495489 / Stephen Hill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4747  Respondent: 15495521 / Jonathan Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of Policy A46 (Normandy and Flexford village expansion)
The whole basis for the identification of this land as a strategic site appears to be achieved through the manipulation of the rules governing the criteria for “sustainability” and “sensitivity”. By considering the settlements of “Normandy” (to the north) and “Flexford” (to the south) as a single settlement for the purpose of “sustainability” the land referenced is considered as not to contribute to “open space”. However these settlements have been considered as separate ones for the purpose of calculating “sensitivity”, and thus achieving the outcome that was clearly intended, otherwise a consistent approach would have been taken for both metrics. Flexford and Normandy are referenced as separate villages in the majority of the Draft Plan, demonstrating this inconsistency. It could be viewed that the assessment of Normandy and Flexford has been manipulated to make the criteria for selecting site A46 achieve a predetermined outcome.

The documentation recently (February 2016) made publicly available indicates that a major developer has been soliciting GBC over the last two years with proposals for this land that include essentially a financial reward to GBC (disguised as a cost-neutral build of a large (7FE) secondary school) if planning was granted for the development of the houses. The selection basis has recently been clarified that the inclusion of a no-cost school was a significant factor. The requirement for the secondary school has not been demonstrated. Several of the neighbouring secondary schools are significantly under-subscribed. In fact, even if Site A46 were to be developed, the 1FE school requirement would easily be accommodated by the neighbouring schools. As has been widely communicated in advance of this public consultation, the inclusion of site A46 is based on an unsubstantiated and circular justification. The proposed secondary school is not viable on its own given its remote location from the major population centres. The proposed housing is not viable own its own without the proposed deal to include the provision of the schools. Neither are actually justified on any substantial evidence.

The selection of site A46 was based on a number of invalid and unsubstantiated statements. Firstly it was included because the land owners were willing to sell the land for development. This is not a valid selection criteria for developing Greenbelt. Almost any landowner would sell land for development if the price was attractive and which meant that they could themselves relocate. Secondly, it was determined by Guildford Borough Councillors that “Normandy would benefit” from the availability of additional local retail spaces. I do not believe that Normandy and Flexford residents have been consulted in anyway on this subjective statement. People that choose to live in rural areas are usually fully aware of the lack of retail space. This has not been an issue for me and my family in the 18 years that we have lived in this village.

I also have concerns that the suitability of the site for the 1100 or so houses has not been considered appropriately given the local infrastructure and environmental factors. The plan does not include a financial case for the long term damage / maintenance of the road and services infrastructure, nor considered the impact on the local environment. In fact Guildford Borough Council previously objected to the large developments proceeding in Aldershot/Farnborough on the basis of the impact to the A323 that runs through Normandy. Policy A47 combined with the sites in Ash/Ash Green are of a similar scale to that opposed by Guildford Borough Council. The site selection includes as part of its justification the improvement
to the Christmas Pie trail between Flexford and Guildford, to enable a cycle super-highway. This trail weaves through ancient woodland and currently contributes to the feeling of openness for many residents in all areas. As a layperson I would suggest that it would be impossible to upgrade this trail without significant damage to the ancient woodland that surrounds it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4748  Respondent: 15495521 / Jonathan Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of Policy A47 and site A47 (Land to east of The Paddocks, Flexford)
This land is clearly part of the open space around Flexford. It borders ancient woodland and agricultural land. It provides a natural soakaway for the existing housing and is under several inches of water for much of the year. A variety of wildlife including birds of prey and herons visit this site. Additionally the road infrastructure to access it is completely unsuitable (single narrow lane and bridge)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9999  Respondent: 15495521 / Jonathan Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7: Guildford Town Centre
I object to the strategic principle that the town centre requires considerable additional retail floor space, when there are consistently vacant retail properties. The level of vacancies varies with the ebb and flow of the national economy, but essentially there has never been a point that I can remember in the 28 years I have lived in or around Guildford where there has been a constraint on retail occupation in the town centre. The future of retail businesses in the UK should be considered - in general additional floor space (and therefore cost overheads) will give way to a click&collect experience where internet shopping and retail collection coupled with an emphasis on showcasing rather than retail stock management will result in a shopping culture that operates with a reduced physical foot print.
Instead, I believe more emphasis should be given to providing additional housing in the town centre, increasing the community focus and creating a significant urban contribution to the housing demand rather than identifying “strategic sites” which are generally in greenbelt. Thus the whole basis of the strategy for the Local Plan is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/9998</th>
<th>Respondent: 15495521 / Jonathan Young</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the interpretation of Policy P2 (Green Belt)
It would appear that the villages of Flexford and Normandy are now removed from the greenbelt to achieve the objectives of the draft plan rather than the green belt being considered as a valid constraint. Anyone visiting the site and walking along the public footpaths that cross the site would surely agree that this land significantly contributes to “openness” both between Flexford and Normandy, and also ensuring openness between Flexford and Ash/Ash Green (which is only a modest walk away).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp172/2649</th>
<th>Respondent: 15495521 / Jonathan Young</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction</td>
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</table>

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I SUPPORT the REMOVAL of sites A46 and A47.

The basis for originally identifying these sites was flawed, due to the manipulation of the rules governing the criteria for “sustainability” and “sensitivity”, the misrepresentation of what constituted a "settlement" for different purposes, and the lack of consideration for the contribution to open space. In addition, the business case for the proposed school was also shown to be miscalculated.

In addition, due to the increase in housing now being proposed in Ash, Ash Green and Tongham, sites A46 and A47 represent areas that are even more critical in maintaining openness and defending the Greenbelt from further planning intrusion in the future.
I also refer to my original statements from my response dated 13/07/2016 sent from my email address [removed] to localplan@guildford.gov.uk on 15/07/2016

I OBJECT to the INCREASE in housing numbers proposed for site A29. The actual total housing target for the entire plan is still not justified and demonstrates a "continuous growth" strategy by the Guildford Borough Council based on economic targets rather than housing need. The numbers planned for Ash and Ash Green will result in major infrastructure (road and rail) congestion.

I OBJECT to the Traveller pitches at site A49. Normandy already has a disproportionately high number of traveller pitches in its vicinity. These should be distributed across the borough.

I OBJECT to the Travelling showpeople plots at site A50. Normandy already has a disproportionately high number of traveller plots in its vicinity. These should be distributed across the borough.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Do not increase the housing numbers for site A29.
2. Remove sites A49 and A50

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4749  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4750  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/4751  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:
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Comment ID: PSLPS16/4754  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10003  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10004  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10001  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Comment ID: PSLPP16/10002  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2543  Respondent: 15495617 / Peter Elliot  Agent:
11. I object to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5186  Respondent: 15495617 / Peter Elliot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

I object to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5127  Respondent: 15495617 / Peter Elliot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreeBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 land at Burnt Common Ware house which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.</td>
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<th>Comment ID: PSLPS16/4958</th>
<th>Respondent: 15495617 / Peter Elliot</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4990  Respondent: 15495617 / Peter Elliot  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A57  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A57 The Paddocks for the provision of 4 travellers pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10336  Respondent: 15495617 / Peter Elliot  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/ West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18646  Respondent: 15495617 / Peter Elliot  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would also like to object to the secretive and high-handed way in which the SHMA process has been The annual house building target is more than double what was agreed in 2010, and more than double what could be explained by the population growth figures for Guildford for the last twenty years. Also, unlike last time, no constraints have been applied for infrastructure or environmental factors, with no explanation offered as to why. GBC has repeatedly refused to involve their electorate in discussing this matter, and has steadfastly refused to explain what factors could account for this huge hike in the annual house building target. All we do know is that G.L. Hearn, who did the SHMA, has a vested interest in setting the figure as high as possible, to generate work for their associates at Constructionline. Government guidelines state that the community should be able to feel confident that the SHMA figure is fair and objective. For the reasons given, GBC has failed woefully in this regard.

Consequently I object to the way the plan proposes to put 70% of the new houses on the Green Belt around Guildford, as this is surely the worst possible option for exacerbating traffic congestion, while putting more of the housing on brown field sites within the town would mean people could walk or cycle to the station or the shops. To make matters even worse, much of the brownfield sites are proposed for commercial use, drawing even more traffic into the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10582  Respondent: 15495617 / Peter Elliot  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10007  Respondent: 15495617 / Peter Elliot  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10467  Respondent: 15495617 / Peter Elliot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2421  Respondent: 15495649 / Stephen Cruse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2420  Respondent: 15495649 / Stephen Cruse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

The Council will not publish the SHMA report so this figure cannot be verified? This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4756  Respondent: 15495649 / Stephen Cruse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq. m proposed. That site was removed from the Plan without any reasoning?

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government states clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4757  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10014  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10008  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of road infrastructure and the congestion that this development will cause to the local village roads (Policy I1)

These villages are currently severely congested throughout the day and parking in villages such as Ripley is already a real problem, further development in these villages will only result in more traffic and parking problems. The Plan does not provide an adequate or achievable strategy for improving capacity on these local roads which in many of the villages particularly Ripley Send and Clandon are narrow and only wide enough for one vehicle at a time. Additionally many of these narrow roads do not have pedestrian footpaths and are both totally unsuitable and extremely dangerous for pedestrians. Bringing an addition of some 5000 houses being proposed close to the village of Ripley will exasperate this already congested area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10015  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough and the Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are already at or close to capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10016  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be considerably improved before any development is done. Highways England has confirmed that they have no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10013  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10010  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object strongly to the proposals to remove the following villages from the Green Belt, Ripley, Send Cladon, Wisley Airfield (A35) and Garlicks Arch (A43) NPP states there needs to be exceptional circumstances for both Green Belt boundaries to be altered and development on Green Belt – these are not exceptional circumstances. These neighbouring villages will merge into one another as a result of the loss of this Green Belt resulting in urban sprawl and loss of the beautiful countryside.

This could be avoided at Garlicks Arch by developing on existing brownfield site just to the south of the site at Burnt Common where there is surplus land affording development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10011  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas of high risk of flooding (Policy P4)

NPP states that local Plans need to take account of climate change over the longer term, including factors such as flood risk. The proposed site at Garlicks Arch (A43) is on the Environment Agency’s flood map as being in a flood zone 3 from a river meaning it has a 1 in 100 or greater chance of flooding each year – the HIGHEST risk category, however the site has been assessed as part of the Councils SFRA as a Flood Zone 2 which is between a 1% and 0.1% probability of river flooding annually. This site floods frequently during the winter months, clearly this site is not fit for purpose and needs to be accurately reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10009  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the proposed development will not be sustainable (Policy S1)

NPP states that the purpose of the planning system is to contribute to the achievement of sustainable development.

This development of over 13,500 homes during the Plan period is not sustainable and will have a permanently detrimental impact by over development of villages in particular between Guildford and the M25 including Ripley, Send & Clandon. The services in these villages are not adequate to cope with the levels of development proposed and these developments do not meet with the needs of the local communities.

Garlicks Arch (A43) and Wisley Airfield (A35) are in unsustainable locations with a total lack of sustainable transport - bus services are infrequent and routes have been reduced, no railway stations within walking distance leaving residents reliant upon cars. There are no plans to improve the infrastructure for Garlicks Arch within the infrastructure plan and once again residents will be reliant on the car. These developments should be considered in areas such as Guildford where sustainable transport can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10012  Respondent: 15495649 / Stephen Cruse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreeBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4878  Respondent: 15495681 / Pippa Mathews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 land at Burnt Common Ware house which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4959  Respondent: 15495681 / Pippa Mathews  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5065  **Respondent:** 15495681 / Pippa Mathews  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/4991  **Respondent:** 15495681 / Pippa Mathews  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I object to policy A57 The Paddocks for the provision of 4 travellers pitches in Rose Lane as this is in excess of current requirements within the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10337  **Respondent:** 15495681 / Pippa Mathews  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2422   **Respondent:** 15495745 / David Williams   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan is based on the use of out of date estimates of population growth. These population projections used to underpin this entire plan were recognizably wrong at the outset and there is major doubt concerning housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10018   **Respondent:** 15495745 / David Williams   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To build a large number of houses in the horsleys would completely change the character of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10020   **Respondent:** 15495745 / David Williams   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Designating station road as a district centre is wrong. It results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10019  Respondent: 15495745 / David Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To build hundreds of houses in the Horsleys is out of all proportion as there is no infrastructure in place to support this. Already Raleigh School is oversubscribed as is the medical centre—impossible to get urgent appointments now. Our busy narrow potholed roads cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10017  Respondent: 15495745 / David Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the local plan for the Horsleys 2016. There are no exceptional circumstances which have been demonstrated and which are required to take East and West Horsley out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2553  Respondent: 15495777 / Michael Lowe  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5188  Respondent: 15495777 / Michael Lowe  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreeBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5130  Respondent: 15495777 / Michael Lowe  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreeBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5007  Respondent: 15495777 / Michael Lowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A57 The Paddocks for the provision of 4 travellers pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10340  Respondent: 15495777 / Michael Lowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10552  Respondent: 15495777 / Michael Lowe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4762  
Respondent: 15495809 / Katie Critchlow  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4764  Respondent: 15495809 / Katie Critchlow  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10030  Respondent: 15495809 / Katie Critchlow  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2552  Respondent: 15495841 / Nicholas Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5190  Respondent: 15495841 / Nicholas Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5131  Respondent: 15495841 / Nicholas Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreeBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPP16/10022</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10432  Respondent: 15495841 / Nicholas Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10046  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Making Better Places

I object to GBC not listening to their residents, who know better than GBC, what is needed to make their areas better places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10047  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sustainable Design, Construction and Energy

I agree that all new developments, whatever the size, should conform to the above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development in Urban Areas and Inset Villages

I do not object if policies H2 and H3 are implemented and **all** H2 developments are implemented without developers using clause 4.2.40 to escape their responsibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<td>Meeting Employment Needs</td>
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<tr>
<td>Permitted development allows commercial properties to be converted to residential use, but at a loss of employment opportunities. I object to development of brownfield sites without some commercial activity being included, proportionate to the size of development</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Location for New Employment Floorspace</td>
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<tr>
<td>I object to excessive development anywhere in the borough when brownfield sites area available.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Maintaining Employment Capacity and Improving Employment Floorspace

I object to permitted development as this is decreasing employment opportunities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10040  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey Research Park

I support the Research Park and its specialism, but I object to the current need to expand. Utilise the land hungry current ground level parking for Research Park employment development and build shared multi-storey or underground parking. Ensure all new Research Park development includes underground car parking, as in other countries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10041  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Rural Economy

**I object** to increasing the rural economy to provide for large, unsustainable, dormitory towns, i.e. Gosden Hill, former Wisley Airfield, Blackwell Farm.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10042  **Respondent:** 15495873 / Gerard Duvé  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Leisure and Visitor Experience

The area is already recognised as a tourist area and should be encouraged.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10043  **Respondent:** 15495873 / Gerard Duvé  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Guildford Town Centre

**I object** that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape so only limited new shops are required. Guildford will have ample opportunity to provide sustainable homes over the Local Plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10044  **Respondent:** 15495873 / Gerard Duvé  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Homes For All: **I object** to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. Freeing up private housing in the town currently used for student accommodation would mean availability for those requiring affordable housing. A new development at Blackwell Farm (2,000 houses) providing accommodation for students is a selfish move by the university.

After the 1st World War 'Homes for Heros were provided countrywide, as was the case for council housing after the 2nd World War. I believe GBC should adopt the same strategy, even in areas of AONB albeit on a reduced scale, to provide sustainable homes alongside current housing for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

Affordable Homes : **I object** that developers can be released from their obligation to provide affordable homes (clause 4.2.40). If planning permission is granted to include affordable homes, that must be enforced to ensure the developer provides them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Rural Exception Homes: I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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**Infrastructure and Delivery**

I object to any development without the necessary infrastructure being put in place prior to development. I object to developments not providing their planned infrastructure, i.e. schools, health centres, prior to the first properties being sold.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10051  **Respondent:** 15495873 / Gerard Duvé  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

**Supporting the Dept of Transport's Road Investment Strategy**

I object to this policy only relating to the strategic road network, the A3/M25, without ensuring any development includes the necessary road infrastructure being implemented. I object to developers funding road infrastructure which suits their wishes and not the necessary needs, i.e. south bound slip road and north bound sliproads at the Ockham roundabout. Such provision at Burnt Common increases the traffic through Ripley should the 2,000+ houses be built at the former Wisley Airfield. The village already suffers traffic log-jams on a daily basis.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/10052  **Respondent:** 15495873 / Gerard Duvé  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10053  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green and Blue Infrastructure.  : I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10032  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey Hills Area of Outstanding Natural Beauty :

I object that the AONB areas are excluded from taking a proportion of new housing developments. Large developments are inappropriate but these areas should provide homes for local people and their families. Policies H2 and H3 should apply throughout the borough, including AONB, but proportionate and sympathetic to each location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10033  Respondent: 15495873 / Gerard Duvé  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is slap bang in the middle of a green belt area and totally unsustainable as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF grounds. This site is far too close to Cobham (1.5km), Pyrford (1.5km) and Woking (2.5km) not to become their urban areas over time which will totally wipe out green belt in this area.

Developments of 2,000 houses in the Green Belt are exploitation and fulfill developer's dreams who can escape their their affordable homes targets (clause 4.2.40) and provide houses for those from outside the borough. I object to GBC realising those developers dreams and ignoring those of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10034  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Countryside

I believe brownfield sites in all areas, including AONB, should be utilised and all areas should provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10035  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Flood Risk and Water Source Protection Zones

All development sites must have consideration to flood risk, not just on the development, but the affects on the surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Presumption in Favour of Sustainable Development : I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create new towns of approx. 2,000 houses. These new towns are not sustainable, but will cause chaos to surrounding areas in terms of infrastructure, i.e. roads, parking, flooding, and will not provide adequate health services, education, shopping/pubs/restaurants/cafes on-site, as does Dickens Heath, Solihull, on which the GBC Pegasus report was based.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10024 | Respondent: 15495873 / Gerard Duvé | Agent: |
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Borough Wide Strategy: I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly. I object these figures were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body. Who are all these homes for? Not local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3266  Respondent: 15495873 / Gerard Duvé  Agent:
Comment ID: pslp172/3265  Respondent: 15495873 / Gerard Duvé  Agent:
Comment ID: pslp172/3268  Respondent: 15495873 / Gerard Duvé  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 – Garlick’s Arch

I object to the removal of this site from Green Belt. It was included at the last minute in the 2016 draft, without justification other than the proposed A3 slip roads.

I object to the proposal of travelling showmen as Ripley already has 4 travellers pitches, with more are proposed on site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A46 – Land South of Normandy / North of Flexford

I object to removing site A46, 1100 homes, from the draft Plan. Like Wisley it is located in Green Belt but unlike Wisley, it is close to a railway station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 – Land around Burnt Common Warehouse

I object to this site being included as well as Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1555  Respondent: 15495873 / Gerard Duvé  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 – Planning for the Borough

I object to GBC making amendments without adhering to the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80).

I object that the amended draft does not encouraging utilising the numerous surface public car parks in to provide sustainable homes.

I object to the amended plan ignoring the government’s NPPF guidelines - “…… local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”

I object to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

I object to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/2551  Respondent: 15495905 / Emma Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
11. I object to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5191  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5133  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreenBelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4888  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 land at Burnt Common Ware house which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4971  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5077  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5010  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A57 The Paddocks for the provision of 4 travellers pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10342  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all insetting of villages from Green belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/ West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10557  Respondent: 15495905 / Emma Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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10. I object to development in areas which are at risk of flooding such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4768  Respondent: 15495937 / C Aruncel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4769  Respondent: 15495937 / C Aruncel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4770  Respondent: 15495937 / C Aruncel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10056  Respondent: 15495937 / C Aruncel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10057  Respondent: 15495937 / C Aruncel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/10054  Respondent: 15495937 / C Aruncel  Agent:
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I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4779  Respondent: 15495969 / Olivia Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10065  Respondent: 15495969 / Olivia Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10066  Respondent: 15495969 / Olivia Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/10062 | Respondent: 15495969 / Olivia Doyle | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/10063 | Respondent: 15495969 / Olivia Doyle | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 4392.